

OFFICIAL TRANSCRIPT OF PROCEEDINGS BEFORE THE POSTAL RATE COMMISSION

In the Matter of:)
) Docket No.: R2006-1
POSTAL RATE AND FEE CHANGES)

VOLUME #18A

Designated Written Cross Examination of USPS Witnesses
Abdirahman (USPS-T-22), Berkeley (USPS-T-39), Bozzo
(USPS-T-12), Bradley (USPS-T-17), Kiefer (USPS-T-36),
Loutscher (USPS-T-28), McCrery (USPS-T-42), Miller
(USPS-T-21), O'Hara (USPS-T-31), Smith (USPS-T-13), Tang
(USPS-T-35), Taufique (USPS-T-48), Van-Ty-Smith
(USPS-T-11), Yeh (USPS-T-38)

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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

DESIGNATION OF WRITTEN CROSS-EXAMINATION

Party

Interrogatories

United States Postal Service

Abdulkadir Abdirahman (USPS-T-22)

Postal Rate Commission

PRC/USPS-POIR No.11 - Q3a redirected to T22

Susan W. Berkeley (USPS-T-39)

Douglas F. Carlson

DFC/USPS-T39-52

Postal Rate Commission

DFC/USPS-2-3 redirected to T39

Response to Question Posed at Hearing- 8/28/06
(Tr. 15/4569)

Response to Question Posed at Hearing- 8/28/06
(Tr. 15/4594-4595)

Response to Question Posed at Hearing- 8/28/06
(Tr. 15/4616)

Response to Question Posed at Hearing- 8/28/06
(Tr. 15/4631-4632)

Response to Question Posed at Hearing- 8/28/06
(Tr. 15/4650-4651)

A. Thomas Bozzo (USPS-T-12)

United Parcel Service

UPS/USPS-T12-47

Michael D. Bradley (USPS-T-17)

Postal Rate Commission

PRC/USPS-POIR No.11 - Q1-2 redirected to T17

PartyInterrogatories**James M. Kiefer (USPS-T-36)**

Postal Rate Commission

PRC/USPS-POIR No.11 - Q3b, 3c, 3d, 7
redirected to T36**L. Paul Loetscher (USPS-T-28)**

Postal Rate Commission

Response to Question Posed at Hearing- 8/10/06
(Tr. 10/1606)Response to Question Posed at Hearing- 8/10/06
(Tr. 10/1607)**Marc D. McCrery (USPS-T-42)**

Amazon.com, Inc.

Response to Question Posed at Hearing- 8/17/06
(Tr. 11/3148-3149)

Postal Rate Commission

PRC/USPS-POIR No.11 - Q4 redirected to T42

Response to Question Posed at Hearing- 8/17/06
(Tr. 11/3148-3149)Response to Question Posed at Hearing- 8/17/06
(Tr. 11/3173)Response to Question Posed at Hearing- 8/17/06
(Tr. 11/3193-3194)**Michael W. Miller (USPS-T-21)**

Postal Rate Commission

UPS/USPS-T21-20

Donald J. O'Hara (USPS-T-31)

Postal Rate Commission

Response to Question Posed at Hearing- 8/30/06
(Tr. 17/5252)**Marc A. Smith (USPS-T-13)**

Postal Rate Commission

PRC/USPS-POIR No.10 - Q02 redirected to T13

Rachel Tang (USPS-T-35)

Postal Rate Commission

Response to Question Posed at Hearing- 8/10/06
(Tr. 7/1887)

PartyInterrogatories**Altaf H. Taufique (USPS-T-48)**

David B. Popkin

DFC/USPS-T48-21, 23-24

Eliane Van-Ty-Smith (USPS-T-11)

Postal Rate Commission

PRC/USPS-POIR No.11 - Q6 redirected to T11

Nina Yeh (USPS-T-38)

David B. Popkin

DFC/USPS-T38-15-18

Respectfully submitted,

Steven W. Williams
Secretary

INTERROGATORY RESPONSES
DESIGNATED AS WRITTEN CROSS-EXAMINATION

<u>Interrogatory</u>	<u>Designating Parties</u>
<u>United States Postal Service</u>	
Abdulkadir Abdirahman (USPS-T-22)	
PRC/USPS-POIR No.11 - Q3a redirected to T22	PRC
Susan W. Berkeley (USPS-T-39)	
DFC/USPS-T39-52	Carlson
DFC/USPS-2 redirected to T39	PRC
DFC/USPS-3 redirected to T39	PRC
Response to Question Posed at Hearing- 8/28/06 (Tr. 15/4569)	PRC
Response to Question Posed at Hearing- 8/28/06 (Tr. 15/4594-4595)	PRC
Response to Question Posed at Hearing- 8/28/06 (Tr. 15/4616)	PRC
Response to Question Posed at Hearing- 8/28/06 (Tr. 15/4631-4632)	PRC
Response to Question Posed at Hearing- 8/28/06 (Tr. 15/4650-4651)	PRC
A. Thomas Bozzo (USPS-T-12)	
UPS/USPS-T12-47	UPS
Michael D. Bradley (USPS-T-17)	
PRC/USPS-POIR No.11 - Q1 redirected to T17	PRC
PRC/USPS-POIR No.11 - Q2 redirected to T17	PRC
James M. Kiefer (USPS-T-36)	
PRC/USPS-POIR No.11 - Q3b redirected to T36	PRC
PRC/USPS-POIR No.11 - Q3c redirected to T36	PRC
PRC/USPS-POIR No.11 - Q3d redirected to T36	PRC
PRC/USPS-POIR No.11 - Q7 redirected to T36	PRC
L. Paul Loetscher (USPS-T-28)	
Response to Question Posed at Hearing- 8/10/06 (Tr. 10/1606)	PRC

InterrogatoryDesignating Parties

Response to Question Posed at Hearing- 8/10/06 (Tr. 10/1607)

PRC

Marc D. McCrery (USPS-T-42)

PRC/USPS-POIR No.11 - Q4 redirected to T42

PRC

Response to Question Posed at Hearing- 8/17/06 (Tr. 11/3148-3149)

Amazon, PRC

Response to Question Posed at Hearing- 8/17/06 (Tr. 11/3173)

PRC

Response to Question Posed at Hearing- 8/17/06 (Tr. 11/3193-3194)

PRC

Michael W. Miller (USPS-T-21)

UPS/USPS-T21-20

PRC

Donald J. O'Hara (USPS-T-31)

Response to Question Posed at Hearing- 8/30/06 (Tr. 17/5252)

PRC

Marc A. Smith (USPS-T-13)

PRC/USPS-POIR No.10 - Q02 redirected to T13

PRC

Rachel Tang (USPS-T-35)

Response to Question Posed at Hearing- 8/10/06 (Tr. 7/1887)

PRC

Altaf H. Taufique (USPS-T-48)

DFC/USPS-T48-21

Popkin

DFC/USPS-T48-23

Popkin

DFC/USPS-T48-24

Popkin

Eliane Van-Ty-Smith (USPS-T-11)

PRC/USPS-POIR No.11 - Q6 redirected to T11

PRC

Nina Yeh (USPS-T-38)

DFC/USPS-T38-15

Popkin

DFC/USPS-T38-16

Popkin

DFC/USPS-T38-17

Popkin

DFC/USPS-T38-18

Popkin

United States Postal Service

**Abdulkadir Abdirahman
(USPS-T-22)**

RESPONSE OF POSTAL SERVICE WITNESS ABDIRAHMAN
TO POIR NO. 11, QUESTION 3(a)

3. Please refer to library reference USPS-LR-L-48, page 44 and the proposed rates tab of USPS-LR-L-36, WP-STDREG-R0621.
 - a. Please explain why the unit mail processing cost for a nonautomation machinable letter is lower than the unit cost for an automation letter.

RESPONSE:

- a. The mail in this rate category is more finely presorted than automation Mixed AADC mail. The cost savings from presortation may have offset the costs required to apply a barcode to the average nonautomation mail pieces.

United States Postal Service

**Susan W. Berkeley
(USPS-T-39)**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORY OF DOUGLAS F. CARLSON (DFC/USPS-T39-52)**

DFC/USPS-T39-52. Please describe the process by which a signature is transferred and transformed from a Form 3849 to an electronic delivery record in a Postal Service database. In your description, please include the time involved for each step to occur and the time that elapses between each step, and please describe whether these steps and the time that elapses between each step would be expected to differ depending on whether the service purchased was electronic return receipt or signature confirmation.

RESPONSE:

Postal Service delivery employees identify all mailpieces that require delivery status scanning prior to, or at the point of, delivery. When the "Delivered" event is appended to any article requiring signature capture, the POS One and Mobile Data Collection Devices (MDCD) prompt the delivery employee to scan the PS Form 3849. During this scanning process, the article's Package Identification Code and the PS Form 3849 Barcode ID are associated in the electronic record created in the device(s).

For POS One devices, the electronic delivery records are uploaded to the Product Tracking System during the evening after office close out. For MDCDs, upon return to the office and cradling the device, delivery status records are uploaded within 15 minutes for large configuration systems and within 24 hours for small configuration systems.

Further, upon return to the office or POS One close out, delivery employees turn in completed PS Forms 3849 and 3811 to the accountable cage or clearance employee. All completed PS Forms 3849 are routed to the Computerized Forwarding System (CFS) site for optical scanning. Completed

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORY OF DOUGLAS F. CARLSON (DFC/USPS-T39-52)**

DFC/USPS-T39-52, Page 2 of 2

(hardcopy) PS Forms 3811 are sent to mail processing via the next available dispatch.

All processes mentioned above are expected to take place on the same day. However, those PS Forms 3849 returned after the dispatch of value are expected to be routed to the CFS site serving the delivery unit on the next available transportation.

Once PS Forms 3849 are received at the servicing CFS site, it is expected that optical scanning of the Forms will take place within 24 hours. The optical scanner creates an electronic image of the recipient's signature, name, and address and transmits it to the Product Tracking System. Once the image file is received by the Product Tracking System, the association created at the time of delivery is used to link the signature image file to the signature article(s) associated with the PS Form 3849 barcode ID. It is expected that association and linking of the signature image to the mailpiece delivery record will take place within 24 hours.

The Postal Service expects signature images to be available to its signature customers between 2 to 4 days after delivery. There are no differences between the signature capture processes for electronic return receipt or Signature Confirmation; thus, this expectation would apply to both services.

RESPONSE OF POSTAL SERVICE WITNESS BERKELEY (USPS-T-39) TO
INTERROGATORIES OF DOUGLAS F. CARLSON,
REDIRECTED FROM THE POSTAL SERVICE (DFC/USPS-2-3,14,24)

DFC/USPS-2. Please provide the percentage of volume in each eligible service for which customers purchased return receipts (e.g., customers purchased a return receipt along with 75 percent of Certified Mail, 10 percent of Insured Mail, etc.).

RESPONSE:

For FY 2005, following are the percentages of volume of eligible host special services where return receipt service was purchased as an ancillary service:

Certified	91 percent
Registered	38 percent
Insurance	2 percent
COD	.08 percent

RESPONSE OF POSTAL SERVICE WITNESS BERKELEY (USPS-T-39) TO
INTERROGATORIES OF DOUGLAS F. CARLSON,
REDIRECTED FROM THE POSTAL SERVICE (DFC/USPS-2-3,14,24)

DFC/USPS-3. Of total return receipt volume, please provide the percentage that customers purchased with each eligible service (e.g., 85 percent of total return-receipt volume was associated with Certified Mail, two percent was associated with Express Mail, etc.).

RESPONSE:

For FY 2005, following are the percentages of return receipt volume by eligible host special service:

Certified	98.7 percent
Registered	0.8 percent
Insurance	0.4 percent
COD	.001 percent

Volume data for return receipts attached to Express Mail are not collected.

**RESPONSE OF WITNESS BERKELEY (USPS-T-39)
TO QUESTIONS POSED ON THE STAND ON AUGUST 28, 2006**

Mr. Straus (GF): "If there's any Postal Service document that has a policy similar to the policy in the March 10 letter [the four scenarios] I'd sure like to see it." (Tr. 15/4569).

RESPONSE:

The Postal Service has been unable to locate any document(s) specifically referencing the four scenarios mentioned in the March 10 letter to Growing Family.

**RESPONSE OF WITNESS BERKELEY (USPS-T-39)
TO QUESTIONS POSED ON THE STAND ON AUGUST 28, 2006**

Mr. Straus (GF): "if the Postal Service loses the money order the Postal Service [sic] gets paid, and if the Postal Service loses the check the mailer might or might not[.] [W]here is that spelled out in the regulations or anywhere else that a mailer can see that risk and that policy?" (Tr. 15/4594-95)

RESPONSE:

There is a generally known risk when accepting a personal check rather than requiring cash as a payment for COD. There are no Postal Service regulations outlining the risk of a check remaining unaccounted for after being forwarded to the mailer.

**RESPONSE OF WITNESS BERKELEY (USPS-T-39)
TO QUESTIONS POSED ON THE STAND ON AUGUST 28, 2006**

Mr. Straus (GF): "I'm troubled here because the question [GF/USPS-T39-6] asked for number of claims paid. We assumed that the answer was number of claims paid especially because it lists an amount that was paid and now we're told by the witness she's not sure whether this is really claims paid or total claims, so could we ask the Postal Service to report on what these data actually are? (Tr. 15/4616)

RESPONSE:

On the stand, I stated that these were total claims (including invalid and denied claims), as it was my understanding that the Postal Service collected data on the total number of claims only, and the claims count referenced in this report would be all claims filed. I have now been corrected that the claims count in this report is for paid claims. Therefore, the report title should be changed from "Claims Count" to "Paid COD Claims Count."

**RESPONSE OF WITNESS BERKELEY (USPS-T-39)
TO QUESTIONS POSED ON THE STAND ON AUGUST 28, 2006**

Chairman Omas: "Mr. Rubin, can you provide that to us as to who made that decision [to reduce the payments to Growing Family in May, 2005]?"

Mr. Straus: And when.

Chairman Omas: And when. (Tr. 15/4631-32)

RESPONSE:

The decision to clarify the claims payment policy resulted from an Office of Inspector General (OIG) finding in early 2005. The ensuing reduction of the payment amount for Growing Family claims was a coordinated decision, also in early 2005, by Corporate Accounting and the Law Department.

**RESPONSE OF WITNESS BERKELEY (USPS-T-39)
TO QUESTIONS POSED ON THE STAND ON AUGUST 28, 2006**

Ms. Dreifuss (OCA): "You said that to provide these answers [to Growing Family interrogatories] you consulted with people at headquarters who oversee the activities of the St. Louis accounting center. . . . I'm wondering who those individuals are at headquarters who oversee these activities, and with whom you consulted. You can give me their positions, not necessarily their names."

.....

Chairman Omas: "Would you please provide for us in writing the people that you talked to with their titles, et cetera, within seven days?" (Tr. 15/4650-4651)

RESPONSE:

Guidance and information for responding to many of the Growing Family interrogatories came from discussions with the following individuals: (1) Manager, St. Louis Accounting Service Center; (2) Manager, Accounts Payable Branch, St. Louis Accounting Service Center; (3) Manager, Revenue and Field Accounting, Headquarters Finance (who oversees payment policy for the St. Louis Accounting Service Center); (4) Accountant, Revenue and Field Accounting, Headquarters Finance; (5) Consumer Research Analyst, Headquarters Consumer Advocate; and (6) Marketing Specialist, Product Development, Headquarters Marketing.

United States Postal Service

**A. Thomas Bozzo
(USPS-T-12)**

Response of United States Postal Service Witness Bozzo (USPS-T-12)
To Follow-Up Interrogatory of United Parcel Service

UPS/USPS-T12-47. Refer to your response to UPS/USPS-T12-38, in which you characterize the term "intermittent presence" as "vague." To clarify, the word "gap" in the following questions refers to situations in which in your data at a particular site for a particular MODS operation: (1st) shows positive hours ("HRS") and total piece handlings ("TPH") in some time period; (2nd) has zero HRS and TPH in a subsequent period; and (3rd) is then followed by a later period showing positive HRS and TPH.

(a) You indicate in your response that "certain operations, particularly Priority Mail and parcel sorting, may only be present in some facilities at periods such as seasonal peaks." Identify all of the MODS operations other than Priority Mail and parcel sorting that "may only be present in some facilities at [certain] periods."

(b) Identify and explain in detail any reasons other than the need to accommodate seasonal peaks that might cause a MODS operation to shut down temporarily, creating a gap as defined above.

(c) Explain in detail how one might distinguish a gap created by the temporary shutdown of a MODS operation from a gap caused by a non-reporting or other data error.

Response.

a. The manual parcels, manual Priority Mail, and SPBS Priority Mail operations were the operations I had in mind in making the statement. Absence of the other operations at the cost pool level that I have studied for USPS-T-12 would not normally be due to seasonal factors.

b. My understanding is that operations may be relocated to other specialized facilities (e.g., L&DCs) or neighboring facilities and subsequently return temporarily or permanently. Also, facilities, or portions thereof, may be closed temporarily for construction or repair, leading to zero data for some or all operations.

c. Periodic presence of an operation, as in the response to UPS/USPS-T12-38, may be taken as signs of seasonal operations. Likewise, a case where the only gap as defined above is a single-period data dropout amid otherwise normal-

Response of United States Postal Service Witness Bozzo (USPS-T-12)
To Follow-Up Interrogatory of United Parcel Service

looking data might be taken as a sign of a data error. In general, though, it would be necessary to obtain additional information to determine the exact situation, as in the responses to UPS/USPS-T12-38-40. Note also that non-reporting does not necessarily constitute a "data error."

United States Postal Service

**Michael D. Bradley
(USPS-T-17)**

RESPONSE OF POSTAL SERVICE WITNESS BRADLEY
TO POIR NO. 11, QUESTION 1

1. Questions 1.a-f pertain to appropriate Excel SISQ and SIMQ calculations for each of the products listed in Response of the United States Postal Service to Presiding Officer's Information Request No. 7, Questions 3-9, file: Calculating Variabilities.xls, Sheet "Variability Calculation," Step 2:

A	B	C	D	E	F	G	H
						SISQ	SIMQ
2	loc	date	bkstd	OSS/SS1	Items	OSS/SS1	OSS/SS1
3	84745.00	4/25/2005	5215045299	0.00	1		

- a. Please confirm that an appropriate Excel Calculation for cell G3 in the above table would be: =IF(AND(F3=1,E3=1),1,""). If not, please provide an appropriate Excel formula to make this calculation.
- b. Please confirm that an appropriate Excel Calculation for cell H3 in the above table would be: =IF(AND(F3=1,E3>1),1,""). If not, please provide an appropriate Excel formula to make this calculation.
- c. Please provide an Excel version of the above table that includes the variables listed in Row 2, all 7,896 values for each variable listed in Calculating Variabilities.xls, Sheet "Variability Calculation," Step 2, along with the SISQ and SIMQ values for all these variables using an appropriate Excel formula. Please do not hard-code the SISQ and SIMQ values into the table. Instead rely upon the appropriate Excel formula to produce the appropriate SISQ and SIMQ value for each of the 7,896 observations used in your proposed regression.
- d. Please sum the SISQ and SIMQ values across all observations for each product listed in Calculating Variabilities.xls, Sheet "Variability Calculation," Step 2.
- e. Please use these summed SISQ and SIMQ values to populate Calculating Variabilities.xls, Sheet "Variability Calculation, Steps 2 and 3 (using the product specific times filed in Calculating Variabilities.Addendum.xls to calculate the overall stamp variability.
- f. Please file a revised version of Calculating Variabilities.xls, along with all other Postal Service files that depend on window service variabilities, if the variabilities that now appear in steps 2 and 3 differ from the values shown in Calculating Variabilities.Addendum.xls.

RESPONSE:

- a. Assuming that the point of the calculation in "cell G3" is to identify with the value of 1.0 the fact that a SISQ transaction took place, confirmed.
- b. Assuming that the point of the calculation in "cell H3" is to identify with the value of 1.0 the fact that a SISQ transaction took place, confirmed.

RESPONSE OF POSTAL SERVICE WITNESS BRADLEY
TO POIR NO. 11, QUESTION 1

- c. The requested spreadsheet, entitled "Calculating SISQ and SIMQ in Excel Using PRC Code.xls" is located within USPS-LR-L-175.
- d. The sums are calculated in "Calculating SISQ and SIMQ in Excel Using PRC Code.xls." As is seen in that spreadsheet, these summed values are the same as the values I obtained using EViews, and that I used as the basis for the variability calculations in Calculating Variabilities.xls.
- e. Because the calculated values for the SISQ and SIMQ transactions are the same as those calculated using EViews, the variabilities calculated using the summed SISQ and SIMQ transactions from the Excel spreadsheet will match those calculated in Calculating Variabilities.xls. In doing this comparison, however, I did detect a typographical error in Calculating Variabilities.Addendum.xls. Specifically, the value for SISQ transactions for Other Special Services was entered as a "1" rather than the correct value of "9." Correcting this typographical error reduces the Other Special Services Variability from 99.4 percent to 95.3 percent. A version of Calculating Variabilities.Addendum.xls with this typographical error corrected is located within USPS-LR-L-175, and is entitled "Calculating Variabilities.Addendum.POIR11.xls."
- f. Because the variabilities calculated using the SISQ and SIMQ values calculated in Excel do not differ from those variabilities found in Calculating Variabilities.Addendum.xls (save for a typo), a revised version is not required. A version correcting the typo is provided in USPS-LR-L-175, in response to part e. above. It is entitled, "Calculating Variabilities.Addendum.POIR11.xls."

RESPONSE OF POSTAL SERVICE WITNESS BRADLEY
TO POIR NO. 11, QUESTION 2

2. Cell D56 of, "Calc_Variabilities.Add.POIR_7_Q6c.xls," filed as an attachment to Response of the United States Postal Service to Presiding Officer's Information Request No. 7, Questions 3-9, calculates a variability for Stamps equal to 50.7%. The table on page 38 of witness Bradley's testimony (USPS-T-17), and USPS-LR-L-5 Papers, B_Workpapers, CS03.XLS, relies upon a Stamp variability of 33.50%.
- a. Please explain whether 50.7% or 33.50% is the correct stamp variability.
 - b. If 33.50% is the correct stamp variability, please identify its derivation and explain why 50.7% was not utilized.

RESPONSE:

- a. The correct variability is 33.5%.
- b. As explained on page 3 of my testimony (USPS-T-17), in the established model the overall stamps variability is the product of three variabilities, the demand side variability, the transaction supply side variability, and the network supply side variability. The variability of 33.5 percent comes from multiplying the three variabilities together as prescribed by the established method. That calculation is presented below:

Demand Side	Transaction Supply Side	Network Supply Side	Overall
65.9%	50.9%	100.0%	33.5%

United States Postal Service

**James M. Kiefer
(USPS-T-36)**

RESPONSE OF POSTAL SERVICE WITNESS KIEFER
TO POIR NO. 11, QUESTION 3(b-d)

3. Please refer to library reference USPS-LR-L-48, page 44 and the proposed rates tab of USPS-LR-L-36, WP-STDREG-R0621.
 - b. Please explain the rationale for a 4 cent rate differential between an automation MADC letter and a nonautomation machinable MADC letter when the cost differential is a negative .091 cents.
 - c. Please explain the rationale for a rate differential of 4.5 cents between an automation ADC letter and a nonautomation machinable ADC letter when the cost differential is .881 cents.
 - d. Page 13 of USPS-T-36 states,

[m]achinable letters that are not eligible for automation rates will have two presort rate options based on whether they are presorted to the Mixed AADC or AADC level... . Because the Postal Service barcodes machinable letters at the AADC, a finer level of presort has little or no value. For this reason, no discount will be offered for finer presorting.

Page 44 of library reference USPS-LR-L-48 shows the modeled unit cost of both MADC and ADC machinable nonautomation letters to be 5.546 cents and the unit cost of both 3-Digit and 5-Digit machinable nonautomation letters to be 5.074 cents. This would seem to indicate that presorting to the 3- and 5- digit level saves the Postal Service .472 cents. In light of this, please explain the basis for your statement "a finer level of presort has little or no value."

RESPONSE:

- b-c. Please see witness Abdirahman's response to part (a) of this question. The differences between the modeled costs for the two categories (mixed AADC (or AADC) nonautomation machinable letters and mixed AADC (or AADC) automation letters) reflect not only the presence or absence of a barcode, but also the different presort (and other mail characteristics) profiles of the two categories as a whole. In other words, the difference in estimated unit costs between corresponding presort levels for nonautomation machinable and automation letters do not solely measure the cost savings due to barcoding a letter, all else being equal, since all else is not held equal by the Postal Service's letter cost models. Indeed, as witness Abdirahman indicates in his response, the finer presort of nonautomation mail

RESPONSE OF POSTAL SERVICE WITNESS KIEFER
TO POIR NO. 11, QUESTION 3(b-d)

reduces (to some unknown extent) the estimated cost differences between nonautomation and automation letters due to barcoding. As long as the net difference in costs remains positive, it is easy to overlook this important fact.

In the case of nonautomation vs. automation flats, witness Miller has provided estimates of mail processing costs at a constant presort profile for the specific purpose of better estimating the value of barcoding flats. Since comparable estimates were not available for letters, I relied on existing automation differentials, along with the Postal Service's longstanding commitment to encourage automation compatibility for letters to select my proposed automation differential. The combined nature of our cost estimates also illustrates the difficulties of interpreting, much less relying on, "passthroughs" calculated between disaggregated cost estimates for different categories of mail. In this case, while a cost-rate relationship (or "passthrough") can be calculated for the "cost differences" between mixed AADC (or AADC) nonautomation machinable letters and mixed AADC (or AADC) automation letters, since these differences measure the net impacts of mail characteristics besides just barcoding, these "passthroughs" have little meaning and give almost no guidance for pricing the barcoding, or automation, differential between automation and nonautomation letters.

- d. My understanding is that the unit cost estimates for the 3-digit and 5-digit nonautomation machinable letters cited in the question reflect the costs of pieces that are presented at destination plants and are barcoded without losing their level of sortation. But, nonbarcoded letters prepared in presort destination trays are typically processed on a single plantwide incoming barcoding scheme regardless

RESPONSE OF POSTAL SERVICE WITNESS KIEFER
TO POIR NO. 11, QUESTION 3(b-d)

of whether the pieces are prepared in 5-digit, 3-digit, or AADC presort trays. There are instances where SCF plants within the service area of an AADC will barcode incoming mail on a similar plantwide scheme when placed in the 3-digit or 5-digit trays for plant's service area, but this represents a minority of the volume. For this reason, a finer sort does not have significant incremental value (see USPS-T-42 at 11, lines 19-26).

RESPONSE OF POSTAL SERVICE WITNESS KIEFER
TO POIR NO. 11, QUESTION 7

7. Please refer to the revised version of USPS-LR-L-82, workbook "WP-ParcelPost-REVISED.xls," sheet "Inputs." The source listed for items 17 (all except a and k) and 19 is "USPS-LR-L-46 (Revised)." The source for the costs listed for these items appears to be the original version of USPS-LR-L-46, not the revised version. Please clarify which library reference is used.

RESPONSE:

The source note is incorrect. The source of the numbers for items 17 (except a and k) is the original version of USPS-LR-L-46. These are the data that were used to develop the proposed pricing for Parcel Post.

United States Postal Service

**L. Paul Loetscher
(USPS-T-28)**

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LOETSCHER
(USPS-T-28) TO QUESTION BY COMMISSION DURING ORAL TESTIMONY

Question 1

In the USPS-LR-L-33 study, how many pieces were removed from the sample? (Tr. Vol. 10 at 1606:3-4, 16-17)

RESPONSE:

In the Non-ECR Standard Mail Non-Letter Redefinition Study (USPS-LR-L-33), observations were taken on 1,743 Standard Mail non-letter pieces. In the data screening process, 10 pieces were removed from the sample due to recording errors that could not be resolved.

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Question 2

What are the confidence intervals for the estimates provided in USPS-LR-L-33, considering to the size of the sample? (Tr. Vol. 10 at 1607:2-5, 9-12)

RESPONSE:

The 90 percent confidence intervals for the estimates provided in USPS-LR-L-33 are provided in the table below.

**Confidence Interval for the LR-L-33 Estimates
at the 90 Percent Level**

Proposed Definitions		Lower Bound of Confidence Interval	Point Estimate	Upper Bound of Confidence Interval
↓ v	Auto Flat	80.41%	84.26%	88.11%
	Non-auto Flat	4.11%	6.94%	9.77%
	Hybrid Flat	0.89%	1.74%	2.59%
	Hybrid Parcel	1.44%	3.14%	4.83%
	Parcel	2.94%	3.92%	4.90%

United States Postal Service

**Marc D. McCrery
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4. POIR 5, Question 1 asked the Postal Service to provide a generalized description of the flow of Standard Mail through the Postal Service from entry to delivery for, among other categories, each hybrid category. Witness McCrery responded, "[t]he flows can not be mapped out until the preparation is finalized." Please provide the flows the mail that will be moved into these new categories currently follow.

RESPONSE:

The categories requested for the hybrid categories in POIR 5, Question 1 are currently following the four flows provided below under the current preparation as flat-shaped mail. If more than one flow is possible, the various flows are indicated with upper-case letters i.e., A, B, C.

a. Nonautomated, Mixed ADC Rigid Flat, Non-destination entry:

1. Mail acceptance and entry
 - a. Non-automation presort mail is received through acceptance units (e.g., BMEU).
 - b. Mail is verified and accepted.
2. Transport to local plant (if necessary)
3. Transport to OBMC

Mail is transported to originating BMC.
4. Mechanized sack sorting operation
 - a. Set up sack sorter (i.e., load sort scheme, set up and label containers, etc.).
 - b. Containers with sacks are moved to the sack sorter induction area.
 - c. Sacks are inducted into the sack sorter.
 - d. Sacks are keyed or scanned.
 - e. Sacks are sorted to corresponding run-out / slide / saw-tooth operation.
 - f. Sacks are manually sorted to the corresponding container according to the label.
 - g. Dispatch containers are placarded and prepared for dispatch.
5. Transport sack to local site listed in L009 labeling list (site performing the origin distribution). See <http://pe.usps.com/text/dmm300/L009.htm> for a list of sites.

Dispatch containers are transported to plant.
- 6A. APPS mixed ADC bundle sorting operation
 - a. Set up bundle distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.

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- c. Containers contents are dumped onto the machine.
 - d. Mail is sorted to containers.
 - e. Dispatch containers are "swept" when full or at end of run.
 - f. Dispatch containers are staged in dispatch staging area or loading docks.
- 6B. SPBS mixed ADC bundle sorting operation
- a. Set up bundle distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Mail is keyed to corresponding destination/operations.
 - e. Mail sorts to containers.
 - f. Dispatch containers are "swept" when full or at end of run.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 6C. Manual mixed ADC bundle sorting operation
- a. Set up containers in a U-shaped configuration for manual distribution of mail.
 - b. Working mail containers are moved to operation.
 - c. Bundles are sorted to containers by reading the address and OEL information on bundles to corresponding containers.
 - d. Dispatch containers are "swept" when full or at end of processing.
 - e. Dispatch containers are staged in dispatch staging area or loading docks.

The following three steps are followed in the event that bundles containing parcel like pieces are intentionally broken for piece distribution or they become loose from the bundle.

- 6D. APPS mixed ADC piece sorting operation
- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is sorted to containers.
 - f. Dispatch containers are "swept" when full or at end of run.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 6E. SPBS mixed ADC piece sorting operation
- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is keyed to corresponding destination/operations.
 - f. Mail is sorted to containers.
 - g. Dispatch containers are "swept" when full or at end of run.

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- h. Dispatch containers are staged in dispatch staging area or loading docks.
- 6F. Manual mixed ADC piece sorting operation
 - a. Set up containers in a U-shaped configuration for manual distribution of mail.
 - b. Working mail containers are moved to operation.
 - c. Straps are removed from bundles.
 - c. Mail is sorted to containers.
 - d. Dispatch containers are "swept" when full or at end of processing.
 - e. Dispatch containers are staged in dispatch staging area or loading docks.
- 7. Flat mail prep (for pieces remaining in bundles)
 - a. Working mail containers with mixed ADC bundles are moved to mail prep operation.
 - b. Set up mail container, container tilter, trash receptacle in preparation of operation.
 - c. Bundles are taken from the working containers, their shrink-wrap / strapping / banding is removed.
 - d. Mail pieces are de-compensated if necessary.
 - e. Mail pieces are placed in flat trays.
 - f. Containers with flat trays are weighed if necessary, and moved to piece distribution operation or staged as appropriate.
- 8. UFSM 1000 outgoing primary operation (for pieces flowing from flat mail prep)
 - a. Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
 - b. Working mail containers (flat tray containers) are moved to operation.
 - c. Mail is fed or ledges are loaded on the machines.
 - d. Pieces are keyed or scanned to corresponding destination / operation.
 - e. Pieces sort to trays.
 - f. Dispatch trays are "swept" when full or at end of run and sorted to containers then staged for further distribution or dispatched to banding / sleeving operation.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 9. UFSM 1000 outgoing secondary operation (if necessary)
 - a. Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
 - b. Working mail containers (flat tray containers) are moved to operation.
 - c. Mail is fed or ledges are loaded on the machines.
 - d. Pieces are keyed or scanned to corresponding destination / operation.
 - e. Pieces sort to trays.
 - f. Dispatch trays are "swept" when full or at end of run and sorted to containers then staged for further distribution or dispatched to banding / sleeving operation.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.

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10. Transport to destination office

Mail is transported to the destination office.

11A. APPS ADC piece sorting operation (volume processed as single parcel pieces at origin).

- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
- b. Working mail containers are moved to operation.
- c. Containers contents are dumped onto the machine.
- d. Mail is sorted to containers.
- e. Dispatch containers are "swept" when full or at end of run.
- f. Dispatch containers are staged in dispatch staging area or loading docks.

11B. SPBS ADC piece sorting operation (volume processed as single parcel pieces at origin).

- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
- b. Working mail containers are moved to operation.
- c. Containers contents are dumped onto the machine.
- d. Mail is keyed to corresponding destination/operations.
- e. Mail sorts to containers.
- f. Dispatch containers are "swept" when full or at end of run.
- g. Dispatch containers are staged in dispatch staging area or loading docks.

11C. Manual ADC piece sorting operation (volume processed as single parcel pieces at origin).

- a. Set up containers in a U-shaped configuration for manual distribution of mail.
- b. Working mail containers are moved to operation.
- c. Mail is sorted to containers.
- d. Dispatch containers are "swept" when full or at end of processing.
- e. Dispatch containers are staged in dispatch staging area or loading docks.

11D. UFSM 1000 - ADC piece distribution operation (for pieces processed as flats)

- a. Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
- b. Working mail containers (flat tray containers) are moved to operation.
- c. Mail is fed or ledges are loaded on the machines.
- d. Pieces are keyed or scanned to corresponding destination / operation.
- e. Pieces sort to trays.
- f. Dispatch trays are "swept" when full or at end of run and sorted to containers then staged for further distribution or dispatched to banding / sleeving operation.
- g. Dispatch containers are staged in dispatch staging area or loading docks.

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- 12A. APPS Incoming primary piece sorting operation (volume processed as single parcel pieces)
- Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - Working mail containers are moved to operation.
 - Containers contents are dumped onto the machine.
 - Mail is sorted to containers.
 - Dispatch containers are "swept" when full or at end of run.
 - Dispatch containers are staged in dispatch staging area or loading docks.
- 12B. SPBS Incoming primary piece sorting operation (volume processed as single parcel pieces)
- Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - Working mail containers are moved to operation.
 - Containers contents are dumped onto the machine.
 - Mail is keyed to corresponding destination/operations.
 - Mail sorts to containers.
 - Dispatch containers are "swept" when full or at end of run.
 - Dispatch containers are staged in dispatch staging area or loading docks.
- 12C. Manual Incoming primary piece sorting operation (volume processed as single parcel pieces)
- Set up containers in a U-shaped configuration for manual distribution of mail.
 - Working mail containers are moved to operation.
 - Mail is sorted to containers.
 - Dispatch containers are "swept" when full or at end of processing.
 - Dispatch containers are staged in dispatch staging area or loading docks.
- 12D. UFSM 1000 incoming primary operation (for pieces processed as flats)
- Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
 - Working mail containers (flat tray containers) are moved to operation.
 - Mail is fed or ledges are loaded on the machines.
 - Pieces are keyed or scanned to corresponding destination / operation.
 - Pieces sort to trays.
 - Dispatch trays are "swept" when full or at end of run and sorted to containers then staged for further distribution or dispatched to banding / sleeving operation.
 - Dispatch containers are staged in dispatch staging area or loading docks.
- 13A. UFSM 1000 incoming secondary operation (for the limited incoming secondary zones processed on the UFSM 1000s)
- Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).

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- b. Working mail containers (flat tray containers) are moved to operation.
 - c. Mail is fed or ledges are loaded on the machines.
 - d. Pieces are keyed or scanned to corresponding destination / operation.
 - e. Pieces sort to trays.
 - f. Dispatch trays are "swept" when full or at end of run and sorted to containers or dispatched to banding / sleeving operation.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 13B. Manual incoming secondary operation (when performed at the plant)
- a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted on the flats case.
 - d. Flat case is "swept" when full or at the end of distribution.
 - e. Mail is swept to trays.
 - f. Trays are sorted and dispatched.
14. Transport to DDU / AO
- a. Dispatch containers are moved to truck loading bay.
 - b. Dispatch containers are loaded onto the truck.
 - c. Dispatch containers are transported to the DDU/AO.
 - d. Received containers are unloaded from the truck at the DDU/AO.
 - e. Received containers are staged at working mail staging area.
- 15A. DDU operations - Incoming secondary flats (unless performed at the plant)
- a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted on the flats case.
 - d. Flat case is "swept" when full or at the end of distribution.
 - e. Mail is swept to trays.
 - f. Trays are sorted and dispatched to carriers.
- 15B. DDU operations - Incoming secondary parcels (for pieces processed as parcels).
- a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted into containers for carriers.
 - d. Containers are dispatched to carriers.
- 16A. Carrier casing (for pieces handled as flats)
- a. Carrier cases the flats into the carrier case.
 - b. Carrier "sweeps" the mail into trays.
 - c. Trays are loaded into containers.
- 16B. Carrier parcel sequencing (for pieces handled as parcels)
Carrier prepares the parcels in route order.
17. Carrier loading
- a. Containers are moved to platform by carrier.
 - b. Mail is loaded into delivery vehicles.
 - c. Empty containers are disposed.
 - d. Mail is delivered.

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Flows b - d assume the mail is prepared in an ADC sack. If the mail is prepared on a pallet, the sack-sorting operations are eliminated and the pallet is cross-docked to the appropriate destination office. Furthermore, when mail is prepared in/on more finely sorted sacks/pallets, some or all of the bundle distribution steps will be eliminated. If the container destinations within the origin BMC service area (intra-BMC), the destination BMC steps can be skipped as well.

b. Nonautomated ADC Rigid flat, Nondestination Entry

1. Mail acceptance and entry
 - a. Non-automation presort mail is received through acceptance units (e.g., BMEU).
 - b. Mail is verified and accepted.
2. Transport to local plant (if necessary)
3. Transport to OBMC

Mail is transported to the Originating BMC.
4. Mechanized sack sorting operation
 - a. Set up sack sorter (i.e., load sort scheme, set up and label containers, etc.).
 - b. Containers with sacks are moved to the sack sorter induction area.
 - c. Sacks are inducted into the sack sorter.
 - d. Sacks are keyed or scanned.
 - e. Sacks are sorted to corresponding run-out / slide / saw-tooth operation.
 - f. Sacks are manually sorted to the corresponding container according to the label.
 - g. Dispatch containers are placarded and prepared for dispatch.
5. Transport to DBMC

Mail is transported to the destination BMC.
6. Mechanized sack sorting operation
 - a. Set up sack sorter (i.e., load sort scheme, set up and label containers, etc.).
 - b. Containers with sacks are moved to the sack sorter induction area.
 - c. Sacks are inducted into the sack sorter.
 - d. Sacks are keyed or scanned.
 - e. Sacks are sorted to corresponding run-out / slide / saw-tooth operation.
 - f. Sacks are manually sorted to the corresponding container according to the label.
 - g. Dispatch containers are placarded and prepared for dispatch.
7. Transport to DADC

Mail is transported to destination ADC.
8. Sack shake-out operation
 - a. Sacks are processed across a sorting belt.
 - b. Working mail sacks are opened and contents are dumped into containers.

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- c. Direct sacks are routed to the corresponding operation.
- 9A. APPS bundle sorting operation
 - a. Set up bundle distribution operation (i.e., load sort scheme, set up and label containers etc.).
 - b. Working mail pallets and sacks of mixed ADC flat bundles are moved to operation.
 - c. Container contents are dumped onto the machine.
 - d. Mail is sorted to containers.
 - e. Dispatch containers are "swept" when full or at end of run.
 - f. Dispatch containers are staged in dispatch staging area or loading docks.
- 9B. SPBS bundle sorting operation
 - a. Set up bundle distribution operation (i.e., load sort scheme, set up and label containers etc.).
 - b. Working mail pallets and sacks of mixed ADC flat bundles are moved to operation.
 - c. Container contents are dumped onto the machine.
 - d. Mail is sorted to containers.
 - e. Dispatch containers are "swept" when full or at end of run.
 - f. Dispatch containers are staged in dispatch staging area or loading docks.
- 9C. Manual bundle sorting operation
 - a. Set up containers in a U-shaped configuration for manual distribution of mail.
 - b. Working mail pallets and sacks of mixed ADC flat bundles are moved to operation.
 - c. Bundles are sorted to containers by reading the address and OEL information on bundles to corresponding containers.
 - d. Dispatch containers are "swept" when full or at end of processing.
 - e. Dispatch containers are staged in dispatch staging area or loading docks.

The following three steps are followed in the event that bundles containing parcel like pieces are intentionally broken for piece distribution or they become loose from the bundle.

- 9D. APPS ADC piece sorting operation
 - a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is sorted to containers.
 - f. Dispatch containers are "swept" when full or at end of run.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 9E. SPBS ADC piece sorting operation

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- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is keyed to corresponding destination/operations.
 - f. Mail sorts to containers.
 - g. Dispatch containers are "swept" when full or at end of run.
 - h. Dispatch containers are staged in dispatch staging area or loading docks.
- 9F. Manual ADC piece sorting operation
- a. Set up containers in a U-shaped configuration for manual distribution of mail.
 - b. Working mail containers are moved to operation.
 - c. Mail is sorted to containers.
 - d. Dispatch containers are "swept" when full or at end of processing.
 - e. Dispatch containers are staged in dispatch staging area or loading docks.
10. Flat mail prep (for pieces remaining in bundles)
- a. Working mail containers are moved to mail prep operation.
 - b. Set up mail container, container tilter, trash receptacle in preparation of operation.
 - c. Bundles are taken from the working containers, their shrink-wrap / strapping / banding is removed.
 - d. Mail pieces are decompensated if necessary.
 - e. Mail pieces are placed in flat trays.
 - f. Containers with flat trays are weighed if necessary, and moved to piece distribution operation or staged as appropriate.
11. UFSM 1000 - ADC piece distribution operation (for pieces flowing from flat mail prep)
- a. Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
 - b. Working mail containers (flat tray containers) are moved to operation.
 - c. Mail is fed or ledges are loaded on the machines.
 - d. Pieces are keyed or scanned to corresponding destination / operation.
 - e. Pieces sort to trays.
 - f. Dispatch trays are "swept" when full or at end of run and sorted to containers then staged for further distribution or dispatched to banding / sleeving operation.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 12A. APPS piece sorting incoming primary operation (volume processed as single parcel pieces)
- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.

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- c. Containers contents are dumped onto the machine.
 - d. Mail is sorted to containers.
 - e. Dispatch containers are "swept" when full or at end of run.
 - f. Dispatch containers are staged in dispatch staging area or loading docks.
- 12B. SPBS piece sorting incoming primary operation (volume processed as single parcel pieces)
- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Mail is keyed to corresponding destination/operations.
 - e. Mail sorts to containers.
 - f. Dispatch containers are "swept" when full or at end of run.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 12C. Manual piece sorting incoming primary operation (volume processed as single parcel pieces)
- a. Set up containers in a U-shaped configuration for manual distribution of mail.
 - b. Working mail containers are moved to operation.
 - c. Mail is sorted to containers.
 - d. Dispatch containers are "swept" when full or at end of processing.
 - e. Dispatch containers are staged in dispatch staging area or loading docks.
- 12D. UFSM 1000 incoming primary operation (for pieces processed as flats)
- a. Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
 - b. Working mail containers (flat tray containers) are moved to operation.
 - c. Mail is fed or ledges are loaded on the machines.
 - d. Pieces are keyed or scanned to corresponding destination / operation.
 - e. Pieces sort to trays.
 - f. Dispatch trays are "swept" when full or at end of run and sorted to containers then staged for further distribution or dispatched to banding / sleeving operation.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 13A. UFSM 1000 incoming secondary operation (for the limited incoming secondary zones processed on the UFSM 1000)
- a. Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
 - b. Working mail containers (flat tray containers) are moved to operation.
 - c. Mail is fed or ledges are loaded on the machines.
 - d. Pieces are keyed or scanned to corresponding destination / operation.
 - e. Pieces sort to trays.

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- f. Dispatch trays are "swept" when full or at end of run and sorted to containers or dispatched to banding / sleeving operation.
- g. Dispatch containers are staged in dispatch staging area or loading docks.
- 13B. Manual incoming secondary operation (when performed at the plant)
 - a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted on the flats case.
 - d. Flat case is "swept" when full or at the end of distribution.
 - e. Mail is swept to trays.
 - f. Trays are sorted and dispatched.
- 14. Transport to DDU / AO
 - a. Dispatch containers are moved to truck loading bay.
 - b. Dispatch containers are loaded onto the truck.
 - c. Dispatch containers are transported to the DDU/AO.
 - d. Received containers are unloaded from the truck at the DDU / AO.
 - e. Received containers are staged at working mail staging area.
- 15A. DDU operations - Incoming secondary flats (unless performed at the plant)
 - a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted on the flats case.
 - d. Flat case is "swept" when full or at the end of distribution.
 - e. Mail is swept to trays.
 - f. Trays are sorted and dispatched to carriers.
- 15B. DDU operations – Incoming secondary parcels (for pieces processed as parcels).
 - a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted into containers for carriers.
 - d. Containers are dispatched to carriers.
- 16A. Carrier casing (for pieces handled as flats)
 - a. Carrier cases the flats into the carrier case.
 - b. Carrier "sweeps" the mail into trays.
 - c. Trays are loaded into containers.
- 16B. Carrier parcel sequencing (for pieces handled as parcels)
Carrier prepares the parcels in route order.
- 17. Carrier loading
 - a. Containers are moved to platform by carrier.
 - b. Mail is loaded into delivery vehicles.
 - c. Empty containers are disposed.
 - d. Mail is delivered.
- c. Nonautomated 3-Digit Rigid Flat, Nondestination Entry
 - 1. Mail acceptance and entry

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- a. Non-automation presort mail is received through acceptance units (e.g., BMEU).
- b. Mail is verified and accepted.
- 2. Transport to local plant (if necessary)
- 3. Transport to OBMC
Mail is transported to Originating BMC.
- 4. Mechanized sack sorting operation
 - a. Set up sack sorter (i.e., load sort scheme, set up and label containers).
 - b. Containers with sacks are moved to the sack sorter induction area.
 - c. Sacks are inducted into the sack sorter.
 - d. Sacks are keyed or scanned.
 - e. Sacks are sorted to corresponding run-out / slide / saw-tooth operation.
 - f. Sacks are manually sorted to the corresponding container according to the label.
 - g. Dispatch containers are placarded and prepared for dispatch.
- 5. Transport to DBMC
Mail is transported to the destination BMC.
- 6. Mechanized sack sorter operation
 - a. Set up sack sorter (i.e., load sort scheme, set up and label containers, etc.).
 - b. Containers with sacks are moved to the sack sorter induction area.
 - c. Sacks are inducted into the sack sorter.
 - d. Sacks are keyed or scanned.
 - e. Sacks are sorted to corresponding run-out / slide / saw-tooth operation.
 - f. Sacks are manually sorted to the corresponding container according to the label.
 - g. Dispatch containers are placarded and prepared for dispatch.
- 7. Transport to DADC
Mail is transported to destination ADC.
- 8. Sack shake-out operation
 - a. Sacks are processed across a sorting belt.
 - b. Working mail sacks are opened and contents are dumped into containers.
 - c. Direct sacks are routed to the corresponding operation.
- 9A. APPS ADC bundle sorting operation
 - a. Set up bundle distribution operation (i.e., load sort scheme, set up and label containers etc.).
 - b. Working mail pallets and sacks are moved to operation.
 - c. Container contents are dumped onto the machine.
 - d. Mail is sorted to containers.
 - e. Dispatch containers are "swept" when full or at end of run.
 - f. Dispatch containers are staged in dispatch staging area or loading docks.
- 9B. SPBS ADC bundle sorting operation
 - a. Set up bundle distribution operation (i.e., load sort scheme, set up and label containers etc.).

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- b. Working mail pallets and sacks are moved to operation.
- c. Container contents are dumped onto the machine.
- d. Mail is keyed to corresponding destination/operations.
- e. Mail sorts to containers.
- f. Dispatch containers are "swept" when full or at end of run.
- g. Dispatch containers are staged in dispatch staging area or loading docks.

9C. Manual ADC bundle sorting operation

- a. Set up containers in a U-shaped configuration for manual distribution of mail.
- b. Working mail pallets and sacks are moved to operation.
- c. Bundles are sorted to containers by reading the address and OEL information on bundles to corresponding containers.
- d. Dispatch containers are "swept" when full or at end of processing.
- e. Dispatch containers are staged in dispatch staging area or loading docks.

The following three steps are followed in the event that bundles containing parcel like pieces are intentionally broken for piece distribution or they become loose from the bundle.

9D. APPS ADC piece sorting operation

- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
- b. Working mail containers are moved to operation.
- c. Containers contents are dumped onto the machine.
- d. Straps are removed from bundles.
- e. Mail is sorted to containers.
- f. Dispatch containers are "swept" when full or at end of run.
- g. Dispatch containers are staged in dispatch staging area or loading docks.

9E. SPBS ADC piece sorting operation

- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
- b. Working mail containers are moved to operation.
- c. Containers contents are dumped onto the machine.
- d. Straps are removed from bundles.
- e. Mail is keyed to corresponding destination/operations.
- f. Mail sorts to containers.
- g. Dispatch containers are "swept" when full or at end of run.
- h. Dispatch containers are staged in dispatch staging area or loading docks.

9F. Manual ADC piece sorting operation

- a. Set up containers in a U-shaped configuration for manual distribution of mail.
- b. Working mail containers are moved to operation.
- c. Mail is sorted to containers.
- d. Dispatch containers are "swept" when full or at end of processing.

RESPONSE OF POSTAL SERVICE WITNESS MCCRERY
TO POIR NO. 11, QUESTION 4

- e. Dispatch containers are staged in dispatch staging area or loading docks.
- 10A. APPS incoming primary piece sorting operation
 - a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is sorted to containers.
 - f. Dispatch containers are "swept" when full or at end of run.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 10B. SPBS incoming primary piece sorting operation
 - a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is keyed to corresponding destination/operations.
 - f. Mail sorts to containers.
 - g. Dispatch containers are "swept" when full or at end of run.
 - h. Dispatch containers are staged in dispatch staging area or loading docks.
- 10C. Manual incoming primary piece sorting operation
 - a. Set up containers in a U-shaped configuration for manual distribution of mail.
 - b. Working mail containers are moved to operation.
 - c. Mail is sorted to containers.
 - d. Dispatch containers are "swept" when full or at end of processing.
 - e. Dispatch containers are staged in dispatch staging area or loading docks.
- 11. Flat mail prep (for pieces remaining in bundles)
 - a. Working mail containers are moved to mail prep operation.
 - b. Set up mail container, container tilter, trash receptacle in preparation of operation.
 - c. Bundles are taken from the working containers, their shrink-wrap / strapping / banding is removed.
 - d. Mail pieces are decompensated if necessary.
 - e. Mail pieces are placed in flat trays.
 - f. Containers with flat trays are weighed if necessary, and moved to piece distribution operation or staged as appropriate.
- 12. UFSM 1000 incoming primary operation (for pieces flowing from flat mail prep)
 - a. Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
 - b. Working mail containers (flat tray containers) are moved to operation.

RESPONSE OF POSTAL SERVICE WITNESS MCCRERY
TO POIR NO. 11, QUESTION 4

- c. Mail is fed or ledges are loaded on the machines.
 - d. Pieces are keyed or scanned to corresponding destination / operation.
 - e. Pieces sort to trays.
 - f. Dispatch trays are "swept" when full or at end of run and sorted to containers then staged for further distribution or dispatched to banding / sleeving operation.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 13A. UFSM 1000 incoming secondary operation (for the limited incoming secondary zones processed on the UFSM 1000)
- a. Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
 - b. Working mail containers (flat tray containers) are moved to operation.
 - c. Mail is fed or ledges are loaded on the machines.
 - d. Pieces are keyed or scanned to corresponding destination / operation.
 - e. Pieces sort to trays.
 - f. Dispatch trays are "swept" when full or at end of run and sorted to containers or dispatched to banding / sleeving operation.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 13B. Manual incoming secondary operation (when performed at the plant)
- a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted on the flats case.
 - d. Flat case is "swept" when full or at the end of distribution.
 - e. Mail is swept to trays.
 - f. Trays are sorted and dispatched.
14. Transport to DDU / AO
- a. Dispatch containers are moved to truck loading bay.
 - b. Dispatch containers are loaded onto the truck.
 - c. Dispatch containers are transported to the DDU/AO.
 - d. Received containers are unloaded from the truck at the DDU/AO.
 - e. Received containers are staged at working mail staging area.
- 15A. DDU operations - Incoming secondary flats (unless performed at the plant)
- a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted on the flats case.
 - d. Flat case is "swept" when full or at the end of distribution.
 - e. Mail is swept to trays.
 - f. Trays are sorted and dispatched to carriers.
- 15B. DDU operations – Incoming secondary parcels (for pieces processed as parcels).
- a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted into containers for carriers.
 - d. Containers are dispatched to carriers.

RESPONSE OF POSTAL SERVICE WITNESS MCCRERY
TO POIR NO. 11, QUESTION 4

- 16A. Carrier casing (for pieces handled as flats)
 - a. Carrier cases the flats into the carrier case.
 - b. Carrier "sweeps" the mail into trays.
 - c. Trays are loaded into containers.
- 16B. Carrier parcel sequencing (for pieces handled as parcels)
Carrier prepares the parcels in route order.
- 17. Carrier loading
 - a. Containers are moved to platform by carrier.
 - b. Mail is loaded into delivery vehicles.
 - c. Empty containers are disposed.
 - d. Mail is delivered.

d. Nonautomated 5-digit Rigid Flat, Nondestination Entry.

- 1. Mail acceptance and entry
 - a. Non-automation presort mail is received through acceptance units (e.g., BMEU).
 - b. Mail is verified and accepted.
- 2. Transport to local plant (if necessary)
- 3. Transport to OBMC
Mail is transported to Originating BMC.
- 4. Mechanized sack sorter operation
 - a. Set up sack sorter (i.e., load sort scheme, set up and label containers, etc.).
 - b. Containers with sacks are moved to the sack sorter induction area.
 - c. Sacks are inducted into the sack sorter.
 - d. Sacks are keyed or scanned.
 - e. Sacks are sorted to corresponding run-out / slide / saw-tooth operation.
 - f. Sacks are manually sorted to the corresponding container according to the label.
 - g. Dispatch containers are placarded and prepared for dispatch.
- 5. Transport to DBMC
Mail is transported to destination BMC.
- 6. Mechanized sack sorting operation
 - a. Set up sack sorter (i.e., load sort scheme, set up and label containers, etc.).
 - b. Containers with sacks are moved to the sack sorter induction area.
 - c. Sacks are inducted into the sack sorter.
 - d. Sacks are keyed or scanned.
 - e. Sacks are sorted to corresponding run-out / slide / saw-tooth operation.
 - f. Sacks are manually sorted to the corresponding container according to the label.
 - g. Dispatch containers are placarded and prepared for dispatch.
- 7. Transport to DADC
Mail is transported to destination ADC.
- 8. Sack shake-out operation

RESPONSE OF POSTAL SERVICE WITNESS MCCRERY
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- a. Sacks are processed across a sorting belt.
 - b. Working mail sacks are opened and contents are dumped into containers.
 - c. Direct sacks are routed to the corresponding operation.
- 9A. APPS ADC bundle sorting operation
- a. Set up bundle distribution operation (i.e., load sort scheme, set up and label containers etc.).
 - b. Working mail pallets and sacks are moved to operation.
 - c. Container contents are dumped onto the machine.
 - d. Mail is sorted to containers.
 - e. Dispatch containers are "swept" when full or at end of run.
 - f. Dispatch containers are staged in dispatch staging area or loading docks.
- 9B. SPBS ADC bundle sorting operation
- a. Set up bundle distribution operation (i.e., load sort scheme, set up and label containers etc.).
 - b. Working mail pallets and sacks are moved to operation.
 - c. Container contents are dumped onto the machine.
 - d. Mail is keyed to corresponding destination/operations.
 - e. Mail sorts to containers.
 - f. Dispatch containers are "swept" when full or at end of run.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 9C. Manual ADC bundle sorting operation
- a. Set up containers in a U-shaped configuration for manual distribution of mail.
 - b. Working mail pallets and sacks are moved to operation.
 - c. Bundles are sorted to containers by reading the address and OEL information on bundles to corresponding containers.
 - d. Dispatch containers are "swept" when full or at end of processing.
 - e. Dispatch containers are staged in dispatch staging area or loading docks.

The following three steps are followed in the event that bundles containing parcel like pieces become loose from the bundle.

- 9D. APPS ADC piece sorting operation
- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is sorted to containers.
 - f. Dispatch containers are "swept" when full or at end of run.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 9E. SPBS ADC piece sorting operation

RESPONSE OF POSTAL SERVICE WITNESS MCCRERY
TO POIR NO. 11, QUESTION 4

- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is keyed to corresponding destination/operations.
 - f. Mail sorts to containers.
 - g. Dispatch containers are "swept" when full or at end of run.
 - h. Dispatch containers are staged in dispatch staging area or loading docks.
- 9F. Manual ADC piece sorting operation
- a. Set up containers in a U-shaped configuration for manual distribution of mail.
 - b. Working mail containers are moved to operation.
 - c. Mail is sorted to containers.
 - d. Dispatch containers are "swept" when full or at end of processing.
 - e. Dispatch containers are staged in dispatch staging area or loading docks.
- 10A. APPS incoming primary piece sorting operation
- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is sorted to containers.
 - f. Dispatch containers are "swept" when full or at end of run.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 10B. SPBS incoming primary piece sorting operation
- a. Set up distribution operation (i.e., load sort scheme, set up containers, label containers).
 - b. Working mail containers are moved to operation.
 - c. Containers contents are dumped onto the machine.
 - d. Straps are removed from bundles.
 - e. Mail is keyed to corresponding destination/operations.
 - f. Mail sorts to containers.
 - g. Dispatch containers are "swept" when full or at end of run.
 - h. Dispatch containers are staged in dispatch staging area or loading docks.
- 10C. Manual incoming primary piece sorting operation
- a. Set up containers in a U-shaped configuration for manual distribution of mail.
 - b. Working mail containers are moved to operation.
 - c. Mail is sorted to containers.
 - d. Dispatch containers are "swept" when full or at end of processing.

RESPONSE OF POSTAL SERVICE WITNESS MCCRERY
TO POIR NO. 11, QUESTION 4

- e. Dispatch containers are staged in dispatch staging area or loading docks.
- 11. Flat mail prep (for pieces remaining in bundles)
 - a. Working mail containers are moved to mail prep operation.
 - b. Set up mail container, container tilter, trash receptacle in preparation of operation.
 - c. Bundles are taken from the working containers, their shrink-wrap / strapping / banding is removed.
 - d. Mail pieces are decompensated if necessary.
 - e. Mail pieces are placed in flat trays.
 - f. Containers with flat trays are weighed if necessary, and moved to piece distribution operation or staged as appropriate.
- 12A. UFSM 1000 incoming secondary operation (for pieces flowing from flat mail prep and for the limited incoming secondary zones processed on the UFSM 1000)
 - a. Set up piece distribution operation (i.e., load sort scheme, set up and label trays etc.).
 - b. Working mail containers (flat tray containers) are moved to operation.
 - c. Mail is fed or ledges are loaded on the machines.
 - d. Pieces are keyed or scanned to corresponding destination / operation.
 - e. Pieces sort to trays.
 - f. Dispatch trays are "swept" when full or at end of run and sorted to containers or dispatched to banding / sleeving operation.
 - g. Dispatch containers are staged in dispatch staging area or loading docks.
- 12B. Manual incoming secondary operation (when performed at the plant)
 - a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted on the flats case.
 - d. Flat case is "swept" when full or at the end of distribution.
 - e. Mail is swept to trays.
 - f. Trays are sorted and dispatched.
- 13. Transport to DDU / AO
 - a. Dispatch containers are moved to truck loading bay.
 - b. Dispatch containers are loaded onto the truck.
 - c. Dispatch containers are transported to the DDU/AO.
 - d. Received containers are unloaded from the truck at the DDU/AO.
 - e. Received containers are staged at working mail staging area.
- 14A. DDU operations - Incoming secondary flats (unless performed at the plant)
 - a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted on the flats case.
 - d. Flat case is "swept" when full or at the end of distribution.
 - e. Mail is swept to trays.
 - f. Trays are sorted and dispatched to carriers.

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TO POIR NO. 11, QUESTION 4

- 14B. DDU operations – Incoming secondary parcels (for pieces processed as parcels).
- a. Set up manual piece distribution operation (set up and label trays etc.)
 - b. Working mail containers are moved to operation.
 - c. Pieces are sorted into containers for carriers.
 - d. Containers are dispatched to carriers.
- 15A. Carrier casing (for pieces handled as flats)
- a. Carrier cases the flats into the carrier case.
 - b. Carrier “sweeps” the mail into trays.
 - c. Trays are loaded into containers.
- 15B. Carrier parcel sequencing (for pieces handled as parcels)
- Carrier prepares the parcels in route order.
16. Carrier loading
- a. Containers are moved to platform by carrier.
 - b. Mail is loaded into delivery vehicles.
 - c. Empty containers are disposed.
 - d. Mail is delivered.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY
TO QUESTION POSED BY AMAZON.COM DURING HEARINGS**

Tr. 11/3148 – 3149 QUESTION:

Can you clarify why the throughput and productivity numbers for a parcel sorting machine with an SSIU appear to be quite similar to the throughput and productivity numbers for a parcel sorting machine without an SSIU?

RESPONSE:

The throughput and productivity numbers provided in the response to AMZ/USPS-T42-1(a) represent the combined primary and secondary throughput and productivity of PSMs in FY 2005 on a national level while the numbers provided in the response to AMZ/USPS-T42-5 represent the corresponding data for secondary PSMs with SSIUs. It is important to note that even though the SSIUs automate the process of induction of parcels on the secondary PSMs eliminating manual induction, the productivity of this operation is a reflection of the additional personnel required to sweep the large number of output bins on the secondary PSMs.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY
TO QUESTION POSED BY APWU DURING HEARINGS**

Tr.11/3173 QUESTION:

What is the readability percentage for Postal Service applied barcodes?

Response:

Mailpieces with Postal Service applied barcodes are mixed with mailpieces with barcodes applied by entities other than the Postal Service as the pieces move through processing operations. Therefore, it is difficult to isolate the readability percentage for Postal Service applied barcodes. Machine specifications identified during the purchase and design of the MLOCR equipment required a 98 percent read rate at the time of application on the mailpiece. We are aware of no studies conducted to determine the readability of postal-applied barcodes in isolation within subsequent letter processing operations.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY
TO QUESTION POSED BY APWU DURING HEARINGS**

Tr. 11/3193 - 3194

Q. You state that while there are some 19,300 ZIP Codes that are not DPS'd, but for some of those DPS is not required. You mention a ZIP Code that is specific to a company as an example. Do you know how many ZIP Codes fall into that category?

A. I don't have that information on the top of my head.

Q. And the same question for PO Boxes.

A. No. I don't know that off the top of my head, no.

Q. Is that something that you could provide for us?

Response:

There are 9723 ZIP Codes identified as Post Office Box ZIP Codes and 2505 ZIP Codes identified as Unique ZIP Codes. Unlike delivery area ZIP Codes which are only activated on July 1, ZIP Codes for PO Boxes and Uniques can be activated at any time of the year and these numbers can change at any time.

There are caveats to both of these with respect to the original question which was asking where (and possibly why) mail was being delivery point sequenced. Our answer tried to convey that there are various levels of sortation which might be considered a DPS sort. For example, for large firms or institutions for whom we stop sortation at the five-digit ZIP Code, that is our last or delivery point sort.

The number of Uniques is undercounted. Postal Service OCR equipment and commercial address matching software do not perform an address look-up when presented with address information from a Unique ZIP Code. Whatever appears

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY
TO QUESTION POSED BY APWU DURING HEARINGS**

on the mailpiece is what our equipment will use to spray the correct five-digit barcode. In the 1990s, some firms and institutions (primarily colleges, universities and military bases) who were assigned these Unique ZIP Codes developed a desire to also use automated equipment to sort their own mail. This required the development of a 'rational' addressing system for the mail destined to the Unique ZIP Code. Once that was accomplished and the addresses were added to the postal address database, the Postal Service removed the Unique indicator from the ZIP Code record in the database, so that the ZIP Code 'looked' like an other delivery area ZIP Code. That action resulted in address matching software returning a result such that a delivery point barcode could be generated and then used by the firm or institution to sort their own mail.

The number of Post Office box ZIP Codes needs to be qualified if intended to be used in the context of DPS sorting. In the early days of ZIP+4 coding, an individual ZIP+4 code was assigned to an individual PO Box number. If the sort plan arranged the mail in +4 code order, the result was a DPS sort. However, as delivery point barcodes were implemented, postal employees came to see that they could 'save' +4 codes and possibly prevent a ZIP Code split, if they assigned +4 codes to a range of PO Box numbers, just as was done on the street. It is no longer possible to assume that for PO Box ZIP Codes, a sector segment sort plan delivers DPS results.

United States Postal Service

**Michael W. Miller
(USPS-T-21)**

RESPONSE OF POSTAL SERVICE WITNESS MILLER TO
INTERROGATORY OF UNITED PARCEL SERVICE

UPS/USPS-T21-20. Refer to your response to UPS/USPS-T21-10, the section listed "DBMC Volume Percent Estimates (USPS-LR-L-46, page 7)," and Tables 7 and 8 in attachment f.pdf in USPS-LR-L-47. If any part below is not fully confirmed, explain in detail.

(a) Confirm that the FY2005 DBMC volumes listed (265,797,297 machinable pieces, 4,080,185 non-machinable pieces, and 51,785 oversize pieces) are the total for Parcel Select (DDU parcels, DSCF parcels and DBMC parcels).

(b) Confirm that there is not a non-machinable rate surcharge for DDU parcels.

(c) Confirm that the total of 4,080,185 non-machinable Parcel Select parcels includes only 439 non-machinable (non-oversize) DU parcels in the calculation.

(d) Confirm that in Tables 7 and 8:

i. There are only 439 non-machinable (non-oversize) DDU parcels listed out of a total volume of DDU parcels of 202,924,596 million, or a non-machinable share of 0.000216%; and

ii. There are no DDU parcel volumes listed for weight increments above 35 pounds.

iii. If confirmed in whole or in part, provide (1) a corrected version of Tables 7 and 8 with corrected DDU volumes; (2) a calculation of the FY 2005 share of machinable, non-machinable and oversize DDU parcels and Parcel Select parcels; and (3) a corrected version of Tables 20 through 24 showing the cubic feet data for non-machinable DDU parcels.

(e) Confirm that using the volumes listed in Tables 7 and 8:

i. The machinable share of DSCF parcels is 96.10 (1,934,807/2,013,251);

ii. The non-machinable (non-oversize) share of DSCF parcels is 3.87% (77,984/2,013,251);

iii. The oversize share of DSCF parcels is 0.023% (460/2,013,251);

iv. The machinable share of DBMC parcels is 93.77% (60,942,727/64,991,420);

v. The non-machinable (non-oversize) share of DBMC parcels is 6.16% (4,001,762/64,991,420);

vi. The oversize share of DBMC parcels is 0.072% (46,931/64,991,420);

RESPONSE OF POSTAL SERVICE WITNESS MILLER TO
INTERROGATORY OF UNITED PARCEL SERVICE

vii. The combined machinable share of DBMC and DSCF parcels is 93.84% (62,877,534/67,004,671);

viii. The combined non-machinable (non-oversize) share of DBMC and DSCF parcels is 6.09% (4,079,746/67,004,671); and

ix. The combined oversize share of DBMC and DSCF parcels is 0.071% (47,391/67,004,671).

(f) Confirm that the individual DBMC and DSCF machinable, non machinable and oversize shares listed in part (e) above should be used on page 7 of USPS-LR-L-46 for DBMC and DSCF parcels.

(g) Confirm that for machinable, non-machinable and oversize shares DDU parcels on page 7 of USPS-LR-L-47 it would be best to use the combined DBMC and DSCF shares in the absence of further information regarding DDU parcels.

RESPONSE:

(a) Confirmed.

(b) Confirmed.

(c) Confirmed.

(d) i. Confirmed.

ii. Confirmed.

iii. No corrections can be made since the specified Tables accurately reflect the figures derived using the methodology employed by USPS-LR-L-47. ODIS-RPW provides two volume by weight per piece distributions for combined permit imprint DDU, DSCF, and Zone 1&2 Parcel Select.

(ORPW cannot separate these three categories because of a lack of distinct markings.) One distribution for this aggregation of DDU, DSCF,

RESPONSE OF POSTAL SERVICE WITNESS MILLER TO
INTERROGATORY OF UNITED PARCEL SERVICE

and Zone 1&2 mail is for machinable volume, and the other is for nonmachinable volume, as determined by the physical characteristics (dimension and weight) reported in ODIS-RPW. These weight per piece distributions are applied, respectively, to permit imprint volume "control totals" from PostalOne for DSCF mach., DSCF nonmach., Zone 1&2 mach., and Zone 1&2 nonmach.. PostalOne does not, however, provide a total permit imprint volume of DDU mach. and DDU nonmach., respectively. It only provides volume for all DDU. Because of this, the USPS-LR-47 methodology assumes that all the PostalOne DDU volume is machinable, and only applies the weight per piece distribution for machinable volumes to the DDU volume total. Therefore no permit imprint DDU nonmachinable volume appears in Table 7 of LR-47. The Postal Service will likely review this methodology in the future.

- (e) i. Confirmed.
- ii. Confirmed.
- iii. Confirmed.
- iv. Confirmed.
- v. Confirmed.
- vi. Confirmed.
- vii. Confirmed.
- viii. Confirmed.
- ix. Confirmed.

RESPONSE OF POSTAL SERVICE WITNESS MILLER TO
INTERROGATORY OF UNITED PARCEL SERVICE

(f) Confirmed that using the suggested figures would be preferable to using the figures currently on USPS-LR-L-46, page 7. Errata to USPS-LR-L-46 will be filed.

(g) Confirmed that using the suggested figures would be preferable to using the figures currently on USPS-LR-L-46, page 7. Errata to USPS-LR-L-46 will be filed.

United States Postal Service

**Donald J. O'Hara
(USPS-T-31)**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS O'HARA
TO QUESTIONS POSED BY VALPAK AT AUGUST 30, 2006 HEARINGS**

Tr. 17/5252:

Please compare the original version of your testimony (USPS-T-31) and the final version filed on August 25, 2006. There are differences in the "original" and "final" proposed cost coverages for Standard Regular and Nonprofit.

Lines 7-9: Please provide information on what changes in revenue and cost caused the cost coverage to increase from 167 to 176.

Lines 16-19: Please also confirm whether 176 or 177 is the correct value for the final Standard Regular and Nonprofit coverage.

RESPONSE

See the attached spreadsheet for the explanation, underlying data and citations.

TY 2008 AR Revenue and Volume-Variable Cost for Standard Mail Regular
As Originally Filed and As Revised 8-25-06
(Dollars in Thousands)

	(1) TYAR Volume- Variable Costs	(2) Postage	(3) Fees	(4) TYAR Revenue	(5) Cost Coverage	(6) Contribution
Standard Mail Regular and Nonprofit						
1 As originally filed:	9,835,815	17,256,051	108,076	17,364,127	177% 176.54%	7,528,312
2 As revised 8-25-05:	9,836,572	17,256,051	101,876	17,357,928	176.46% 176%	7,521,356
3 Change (line 2 - line 1)	757	-	(6,199)	(6,199)	-0.08%	(6,956)

Response to (i), which referred to the following erratum:

<u>Page*</u>	<u>Line*</u>	<u>Change</u>	<u>Explanation</u>
(26) 27	(21) 3	"167" to "176"	(a) At the time of filing the correct coverage was 177%, and the as-filed Exhibit 31B had the correct value. However, in my testimony, it was mis-typed as 167%. (b) When revised testimony and exhibits were filed on August 25th, small changes in costs and in fee revenues had reduced the ratio of revenue to cost by 0.08 percentage points, causing the coverage value to round down to 176% instead of up to 177%. Costs went up 757 because APC savings were moved from mail processing, where they benefited Standard Regular, to window service, where they did not. Fee revenue declined by 6,199. Of this, 5,982 was due to a reduction in the combined revenue from the long-standing Standard Weighted Fee (forwarding & return) and the new Standard Forwarding Fee. Note also that, in the summary of errata for my testimony, the citation to revised fee data was "USPS-LR-L-123-Revision-2"; this should be changed to REV 8-24-06 USPS-LR-L-123.xls.

Response to (ii), which referred to the following erratum:

<u>Page*</u>	<u>Line*</u>	<u>Change</u>	<u>Explanation</u>
(27) 28	(19) 1	"177" to "176"	The correct value for the final coverage is 176, as explained in part (b) of my response (i) above, and was correctly shown in the revised testimony. This question might have been answered on the spot had the witness remembered that the questioner was looking at the as-filed testimony.

*Page and line numbers in parentheses refer to the as-filed Testimony.

United States Postal Service

**Marc A. Smith
(USPS-T-13)**

REVISED 8/22/2006

**RESPONSE OF POSTAL SERVICE WITNESS SMITH TO
PRESIDING OFFICER'S INFORMATION REQUEST NO. 10**

2. In response to PSA/USPS-T13-1.c. and 1.d, witness Smith acknowledges that the unit mail processing costs for First-Class presort parcel and ECR parcels seemed to be anomalous, but that he can not explain why. The table below shows that the unit costs have been anomalously high, at least, since R2001-1.

Test Year Unit Attributable Mail Processing Cost (Cents) - Parcels

	<u>R2001-1</u>	<u>R2005-1</u>	<u>R2006-1</u>
First-Class Presort	270.32	288.91	303.81
ECR	205.95	893.44	2405.04

Source: Docket No. R2001-1, USPS-LR-J-53

Docket No. R2005-1, USPS-LR-K-53

Docket No. R2006-1, USPS-LR-L-53

Witness Czigler's response to PSA/USPS/T13-1.b. shows coefficients of variation (CVs), associated with the unit mail processing costs above, for First-Class presort parcels and ECR parcels, of 11.4 percent and 13.4 percent, respectively. Generally, CVs of this magnitude are considered to be high. These unit costs are important because they are used to design parcel rates in ECR and First- Class.

- a. When your analysis showed that the average cost simply of processing each ECR parcel (not counting transportation, delivery, etc.) was \$24.00 did you consider this anomalous? If not, why not? If yes, did you convey your concerns to your superiors? If not, why not?
- b. Did you alert the rate design analyst responsible for ECR of this potential problem? If not, why not?
- c. Have you undertaken any additional studies or analysis to identify the cause of this outcome? If not, why not?
- d. Have you undertaken any analysis to develop an appropriate adjustment? If not, why not?
- e. If no additional studies or analysis has been performed to identify the cause of this outcome, please undertake such an effort and indicate when a discussion of the actual cause can be provided.
- f. If no appropriate adjustment has yet been identified, please develop such an adjustment.

RESPONSE:

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- a. Yes, I considered the Standard ECR parcel processing cost, which exceeds \$24, as anomalous. I did not alert my manager or others regarding the high processing unit costs for Standard ECR parcels because such results had been occurring in previous years (as indicated by the table provided in the question) and had been seen by managers and other staff.

Prior to Docket No. R2005-1, pricing managers and staff had requested a look into an apparent inconsistency between costs and volumes for Standard Regular parcels, as I indicate in my response to PSA/USPS-T13-3. Pricing personnel identified what they thought was the reason for the inconsistency - that parcel shaped pieces which qualified for automation flat rates were reported as flats in RPW, but as parcels in our costs - as I discuss in my testimony, USPS-T-13, pages 34-35.

In looking into the inconsistency in costs and volumes for Standard Regular parcels, the anomalously high processing unit costs for Standard ECR parcels came to my attention and that of my manager and others. The inconsistency arising from parcel shaped pieces qualifying for automation flats rates for Standard Regular did not apply to ECR. Moreover, there didn't seem to be the same interest or need for resolving the ECR parcel cost

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anomaly.¹ It should also be noted that in preparations for this docket and the last docket, I was not aware of the Postal Rate Commission's interest in addressing the anomalous Standard ECR parcel costs.

For these reasons, it was not pursued.

- b. No, I did not alert the rate design analyst responsible for ECR of this cost anomaly. As I indicated in my response to part a, I addressed inconsistencies between volumes and costs for Standard Regular parcel costs; no indication of need was forthcoming on ECR parcels.
- c. No, see my response to part a.
- d. No, see my response to part a.
- e. As I indicate above, the source of the Standard ECR parcels cost anomaly is unclear. In addition, I am not able to say when the actual cause of this anomaly can be determined. I am told that the Postal Service has been investigating this issue in response to the questions raised in POIR No. 5, question 16, and is considering collecting additional data. The result of this work is not likely to be available for this rate case.

Data currently available, however, can shed some light on this. I have attached, in Attachment 1, the mail processing labor

¹ See Postal Service response to POIR No. 2, question 3 in Docket No. R2005-1.

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costs per piece using Postal Service and Postal Rate Commission cost methodologies for First-Class single piece, First-Class presort, Standard ECR and Standard Regular parcels for the years 1996, 1998, 1999, 2000, 2004 and 2005.² Please note the unit cost for Standard ECR parcels has exceeded First-Class single-piece parcels unit costs since FY 1999, under both Postal Service and Postal Rate Commission cost methods. In addition, the Standard ECR parcel unit cost has risen at a rapid pace, suggesting that the cost anomaly is growing over time.³ While the source of the anomaly is unclear, there does appear to be an inconsistency between determining processing labor costs and developing volumes for Standard ECR parcels.

In my testimony, USPS-T-13, page 35, I indicate that an estimate of the inconsistency between Standard Regular parcel costs and volumes can be obtained by comparing RPW by shape

² These are the base years for all the omnibus rate case filings for Docket No. R97-1 and since. It was in Docket No. R97-1 that the MODS cost pool based method for mail processing labor costs was introduced.

³ Changes in cost and volume data systems and methodology changes over this time period have no doubt contributed to changes in Standard ECR parcel unit costs for some years. For instance see witness Bozzo, USPS-T-46, pages 38-39 on the discussion of the impact of IOCS redesign on Standard ECR costs. Nevertheless, most of the observed changes in Standard ECR parcel unit costs can not be accounted for due to changes in data systems or methodology. For additional information on the changes in data systems or methodology over the period FY 1996 to FY 2005, see the documentation provided in each of the Dockets listed in Attachment 1.

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Report data (from USPS LR-L-87) and ODIS-RPW sample based Standard Regular volumes by shape. The basis for this indication is that ODIS-RPW sample based system and the cost systems (which are also sample based) have the same definition of shape and, therefore, diverge from RPW by shape data in the same way. Thus, parcel shaped mail pieces which qualify for automation flats rates and which are reported as flats in RPW, and as parcels in cost systems, would also be reported as parcels in ODIS-RPW volumes by shape. Attachment 2 shows the comparison of RPW by shape and ODIS-RPW volumes by shape for Standard Regular. The last column has the ratio of RPW by shape volumes (USPS LR-L-87/mailling statement based) to ODIS-RPW sample based system volumes for Standard Regular parcels for the fiscal years 1996 to 2005. This ratio shows that the Standard Regular parcel volumes for the years FY 1996 to FY 1998 were about the same for the two systems. However, starting in FY 1999 -- which is when the parcel rate surcharge and DMM 301.3.4.2 allowing certain parcel-shaped pieces to qualify for automation flats rates were implemented -- RPW by shape parcel volumes have declined relative to those reported by ODIS-RPW. The decline in the ratio of RPW by Shape volumes to ODIS-RPW volumes for Standard Regular parcels since 1999 is consistent with the rise in the

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Standard Regular parcels unit costs, thus showing the value of the ratio as a measure of the cost and volumes inconsistency.

For Standard ECR parcels, the reason for cost and volume inconsistency is unknown. If, however, this inconsistency is reflected by inconsistency between RPW by Shape volumes and ODIS-RPW volumes for Standard ECR parcels, as may well be the case, then we can again use the ratio of RPW by Shape volumes to ODIS-RPW volumes for Standard ECR parcels to get a measure of inconsistency between costs and volumes. Attachment 3 shows a very large divergence between RPW by Shape volumes and ODIS-RPW volumes for Standard ECR parcels. It is one that has grown over time and it appears that this divergence has been present in the whole FY 1996 to FY 2005 time period. This divergence was present before the FY 1999 implementation of the parcel rate surcharge for Standard Mail.

- f. An approach is to apply the same adjustment process used for Standard Regular using ODIS and RPW as shown in my testimony, USPS-T-13, Attachment 13, to Standard ECR parcels. Even without knowing the source for the cost anomaly, one can support the use of this method to adjust Standard ECR parcel costs on the basis that ODIS-RPW and the cost systems are both sample based

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and have the same definition of shape and, therefore, both may well diverge from RPW by shape data in a parallel way.

I provide a version of my testimony Attachment 13 for Standard ECR parcels, in Attachment 4 of this response. This shows the adjustment to be made to both Standard ECR flats and parcels as done for Standard Regular flats and parcels in USPS-T-13, Attachment 13. The test year Standard ECR parcel unit cost of 2450.04 cents as reported in USPS-T-13, Attachment 14, would be 27.87 cents, if adjusted as proposed. In addition, Standard ECR flats processing unit costs would rise by 3.5 percent from 1.94 cents to 2.01 cents.

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ATTACHMENT 1
TO QUESTION 2

**MAIL PROCESSING LABOR UNIT COSTS FOR PARCELS FOR USPS AND PRC METHODS
BASE YEARS FY 1996 TO FY 2005***

USPS LABOR UNIT COST TRENDS

BASE YEAR	1996	1998	1999	2000	2004	2005
FIRST- CLASS SINGLE-PIECE	43.77	45.52	47.55	53.33	61.06	67.68
FIRST-CLASS PRESORT	20.68	110.59	87.78	163.68	184.02	203.95
STD ECR	9.07	21.59	91.50	117.14	595.08	1,637.91
STD REGULAR	17.22	30.77	31.62	37.89	50.43	46.58
DOCKET NO.	R97-1	R2000-1	R2000-1	R2001-1	R2005-1	R2006-1
USPS LR-	H-106	I-81	I-464	J-46	K-148	L-143
SPREADSHEET	CSTSHAPE.XLS	MPSHAPBN.xls	SP99USPS.xls	shp00usps.xls	shp04usps.xls	shp05usps.xls

PRC LABOR UNIT COST TRENDS

BASE YEAR	1996	1998	1999	2000	2004	2005
FIRST- CLASS SINGLE-PIECE	58.81	48.19	51.89	58.77	68.54	70.92
FIRST-CLASS PRESORT	26.55	85.10	62.00	121.58	159.17	207.36
STD ECR	12.30	25.01	82.08	125.79	604.06	1,376.17
STD REGULAR	23.90	32.52	33.67	40.46	58.46	50.23
DOCKET NO.	R97-1	R2000-1	R2000-1	R2001-1	R2005-1	R2006-1
USPS LR-	H-320	I-137	I-466	J-81	K-99	L-99
SPREADSHEET	CSTSHAPE.XLS	MPSSHA~1.xls	SP99PRC.xls	shp00prc.xls	shp04prc.xls	shp05prc.xls

*USING THE SPREADSHEETS LISTED ABOVE, CALCULATIONS WERE DONE BY TAKING THE TOTAL LABOR PROCESSING COSTS FROM SHEET PARCELS (2) AND DIVIDING BY BASE YEAR VOLUMES FOR EACH CATEGORY. FOR DOCKET NO. R97-1 SEE SHEET ADJ. PARCELCST. COSTS FOR THESE SHEETS INCLUDE CRA WORKSHEET AND PREMIUM PAY ADJUSTMENTS.

RESPONSE OF POSTAL SERVICE WITNESS SMITH TO
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COMPARISON OF STANDARD REGULAR RPW AND ODIS VOLUMES BY SHAPE FOR FY1996 TO FY2005

RPW SHAPE REPORT VOLUME BY CLASS & SHAPE Volume In Thousands					ORIGIN-DESTINATION INFORMATION SYSTEM DESTINATING VOLUME BY CLASS & SHAPE Volume In Thousands Controlled to RPW				RATIO OF RPW TO ODIS FOR PARCELS/PPS VOLUMES
FY	Letters/Cds.	Flats	Parcels/PPs	All Shapes	Letters/Cds.	Flats	Parcels/PPs	All Shapes	
<i>Source: LR-L-87 Shape GFY 2005rv.xls and predecessors.</i>					<i>Source: ODIS-RPW UDS file and predecessors.</i>				
1996	26,762,761	11,776,419	911,794	39,450,974	26,556,590	12,080,851	813,533	39,450,974	1.121
1997	27,987,649	13,865,284	852,716	42,705,649	29,015,635	12,859,065	830,949	42,705,649	1.026
1998	30,082,582	14,714,976	854,093	45,651,650	31,179,949	13,614,401	857,300	45,651,650	0.996
1999	33,724,748	15,421,273	799,839	49,945,860	34,345,319	14,688,773	911,769	49,945,860	0.877
2000	37,872,913	15,771,844	711,753	54,356,510	38,223,109	15,308,226	825,175	54,356,510	0.863
2001	40,421,962	14,996,482	676,623	56,095,067	40,344,656	14,968,069	782,342	56,095,067	0.865
2002	40,725,213	13,497,171	640,574	54,862,958	40,047,299	14,011,353	804,306	54,862,958	0.796
2003	43,928,876	13,625,157	610,021	58,164,054	43,298,128	14,048,555	817,371	58,164,054	0.746
2004	48,117,714	13,859,534	590,572	62,567,820	47,479,534	14,306,463	781,823	62,567,820	0.755
2005	51,289,509	14,028,861	600,304	65,918,674	50,560,811	14,573,851	784,012	65,918,674	0.766

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ATTACHMENT 3
TO QUESTION 2

COMPARISON OF STANDARD ECR RPW AND ODIS VOLUMES BY SHAPE FOR FY1996 TO FY2005

RPW SHAPE REPORT VOLUME BY CLASS & SHAPE					ORIGIN-DESTINATION INFORMATION SYSTEM DESTINATING					RATIO OF RPW TO ODIS FOR PARCELS/IPPS VOLUMES
Volume in Thousands					VOLUME BY CLASS & SHAPE					
					Volume in Thousands					
Source: LR-L-87 Shape GFY 2005rV.xls and predecessors.					Controlled to RPW					
FY	Letters/Cds.	Flats	Parcels/IPPs	All Shapes	Letters/Cds.	Flats	Parcels/IPPs	All Shapes		
1996	15,102,584	16,915,917	70,853	32,089,354	15,105,610	16,858,478	125,266	32,089,354	0.566	
1997	13,938,145	20,383,605	55,043	34,376,793	16,148,760	18,145,232	82,801	34,376,793	0.665	
1998	15,091,974	21,564,244	49,997	36,706,215	16,757,151	19,863,665	85,400	36,706,215	0.585	
1999	13,531,544	22,118,596	23,674	35,673,814	14,365,305	21,231,515	76,994	35,673,814	0.307	
2000	11,892,684	23,790,828	17,125	35,700,637	12,092,096	23,501,006	107,535	35,700,637	0.159	
2001	10,307,620	23,529,662	6,080	33,843,362	9,867,071	23,868,419	107,872	33,843,362	0.056	
2002	9,716,807	22,640,951	9,920	32,367,678	8,804,191	23,457,370	106,117	32,367,678	0.093	
2003	8,737,941	23,453,648	2,873	32,194,462	8,011,783	24,045,575	137,104	32,194,462	0.021	
2004	8,500,989	24,492,946	1,766	32,995,701	8,650,349	24,253,825	91,528	32,995,701	0.019	
2005	9,040,800	25,981,881	737	35,023,418	9,039,834	25,918,785	64,798	35,023,418	0.011	

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ATTACHMENT 4
TO QUESTION 2

RESPONSE OF POSTAL SERVICE WITNESS SMITH TO
PRESIDING OFFICER'S INFORMATION REQUEST NO. 10

STANDARD ECR FLATS-PARCEL COST ADJUSTMENT FOR COSTS BY SHAPE

PART I: CALCULATION OF RPW/RPW-ODIS RATIO FOR STANDARD ECR PARCELS

ORIGIN-DESTINATION INFORMATION SYSTEM - REVENUE PIECES & WEIGHT
STANDARD MAIL DESTINATING VOLUME BY SHAPE, FY2005
Volumes in 000s

ODIS		Letters & Cards	Flats	IPPS/Parcels	Total		
STANDARD MAIL	ECR-RT	6,867,690	19,690,868	49,228	26,607,786		
All	OTHER	52,739,909	15,201,963	817,802	68,759,674		
	ALL	59,607,600	34,892,831	867,030	95,367,461		
ODIS							
Distribution Key %	ECR-RT	25.8%	74.0%	0.2%	1		1
	OTHER	76.7%	22.1%	1.2%	1		1
	ALL						
RPW Volumes with ODIS Shape Shares							
		Letters & Cards	Flats	IPPS/Parcels	Total		
RPW Adjusted	ECR-RT	3,039,834	25,918,785	64,798	35,023,418		
STANDARD MAIL	OTHER	50,560,811	14,573,851	784,012	65,918,674		
All	ALL	59,600,645	40,492,636	848,810	100,942,091		
				100,942,091			
RPW Volumes by Shape							
RPW	ECR-RT	9,040,800	25,981,881	737	35,023,418		
STANDARD MAIL	OTHER	51,289,509	14,028,861	600,304	65,918,674		
All	ALL	60,330,308	40,010,742	601,041	100,942,091		
					100,942,091		
RPW/RPW-ODIS	ECR				0.011374118		

PART II: CALCULATION OF ADJUSTMENT

				Unit Costs With Final Reconciliation Factor	
Unadjusted Costs				Unadjusted Unit Costs	
Std. ECR Unit Costs	n/a	1.96	2,472.41	1.94	2,450.04
Total ECR Costs		508,840	18,222		
Split of Parcel Costs to Flats & Parcels		18,015	207		
Adjusted Costs				Adjusted Unit Costs	
Total ECR Costs		526,854	207		
Std. ECR Unit Costs		2.03	28.12	2.01	27.87
Adjustment Ratios		1.035	0.011374118	1.035	0.011374118

Based on USPS LR-L-53, shp08usps.xls

United States Postal Service

**Rachel Tang
(USPS-T-35)**

RESPONSE OF POSTAL SERVICE WITNESS TANG
TO HEARING QUESTION BY CHAIRMAN OMAS

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Chairman Omas: "Would you please provide for the record anything and everything that you've used, . . . when it comes to small publications of 15,000 or less and what criteria you took into consideration," (Tr. 7/1887)

RESPONSE:

Attached is my analysis of postage increases under the proposed rates for the same 251 Periodicals publications analyzed in Docket No. C2004-1. See Docket No. C2004-1, Response of Postal Service Witness Tang to Presiding Officer's Information Request (POIR) No. 2, Item 2 (Tr. 6/2242-51). This analysis was performed as the rates were developed, prior to filing Docket No. R2006-1, to assess the impact of the proposed Periodicals rates on a variety of customers. I used the model and the FY 2003 data built for my rebuttal testimony and my responses to POIRs in Docket No. C2004-1, which implicitly assumes, therefore, that: 1) these publications continue to have the same mail characteristics, and 2) the characteristics do not reflect the 24-piece rule change, since it was not yet in effect.

This second assumption means that percentage changes for some of the sample publications may be overstated. For instance, the rule change should have resulted in fewer sacks, so the 85-cent container rate would apply to fewer containers, and the "after" postage per piece would be somewhat lower.¹ To gauge the likelihood of the 24-piece rule affecting the "after" postage, I have added a new column, column J, "Sacked Portion Average Pc per Sack" to the

¹ It is possible that some presort density would be lost with the 24-piece rule, but the "after" postage would likely still be lower. For barcoded pieces, the presort rate eligibility is based on the bundle presort level, not the container presort level, so a bundle moving to a less-finely-presorted sack would not experience a loss of presort rate level.

RESPONSE OF POSTAL SERVICE WITNESS TANG
TO HEARING QUESTION BY CHAIRMAN OMAS

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analysis. This column, which pertains to the sacked portion of the mailing for each publication, can be used to identify those publications with low "pieces per sack" figures. Those publications are more likely to have fewer sacks now than in 2003, and therefore would experience lower percentage increases than those displayed in this analysis. Interestingly, the only publications in the analysis experiencing an increase over 20 percent have fewer than 22 pieces per sack. It is likely that publications with pieces per sack this low would today have fewer sacks, and hence would experience less impact from the new container rate.

The same criteria as in Docket No. C2004-1 were adopted for this analysis to define the three circulation groups: small-circulation publications are those with circulations of at most 15,000 copies per issue; medium-circulation publications are those with circulation between 15,000 and 100,000 copies per issue; and large-circulation are those with circulation above 100,000 copies per issue. As described in my rebuttal testimony in Docket No. C2004-1 (USPS-RT-2, at 2-3; Tr. 6/2226-27), these publications were further divided based on density. High-density Periodicals are publications with more than 30 percent of their mail volume paying 5-Digit or Carrier-Route rates, while low-density publications are those with less than 30 percent of the volume paying 5-Digit or Carrier-Route rates.

Data have been sorted by publication size, then density, and finally, the percentage increase. The publication IDs and the corresponding publications are identical to those provided in Docket No. C2004-1.

RESPONSE OF POSTAL SERVICE WITNESS TANG
TO HEARING QUESTION BY CHAIRMAN OMAS

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It is worth noting that this analysis reflects the proposed rates which generate additional Periodicals revenue to meet the Docket No. R2006-1 revenue requirement, while the original assessment in Docket No. C2004-1 was on a revenue-neutral basis. In other words, the attached percentage increases not only incorporate the effect of the new rate features (such as the container rate), but also a general rate increase. The percentage increases calculated for Docket No. C2004-1 did not include a general rate increase; they only reflected the effect of the new rate structure.

Several additional observations are worth making. First, the Postal Service used these data to examine the impact on Periodicals customers. Of particular concern was the impact on smaller-circulation customers. While in many cases the observed impact was greater than average, in no instance was the observed impact greater than 40 percent. Efforts to reduce the maximum impact resulted in rate design that did not foster the kind of efficiencies the Postal Rate Commission supported in its Docket No. C2004-1 Decision; efforts to increase the incentives resulted in adverse postage impacts comparable to those resulting from the Time-Warner proposal. As such, I would note that our desire to mitigate the impact on small publications weighed heavily on my rate design decisions, such as the size of the container charge. While some impact was unavoidable, the table indicates that the Postal Service was mindful of the combined impact of a rate change needed to reflect cost changes, plus the rate design changes needed to encourage more efficient behavior.

RESPONSE OF POSTAL SERVICE WITNESS TANG
TO HEARING QUESTION BY CHAIRMAN OMAS

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In summary, the impact on publications of all sizes was considered when the proposed rates were developed. The proposed rates include significant incentives for more efficient containerization, without resulting in unacceptable increases for those that cannot take advantage of those incentives.

Tang Homework Attachment
Page 1 of 4

Number of Observation	Publication ID	Size	Density	Editorial %	Piece Weight	Current Postage per Piece	Proposed Postage per Piece	Sacked Portion	
								% Change	Average Pc per Sack
41	P1HL22	Large	High	100%	1.13	0.327	0.338	3.29%	21.5
32	P1HL13	Large	High	100%	0.66	0.228	0.243	6.71%	27.2
J	L7	Large	High	60%	1.48	0.506	0.545	7.63%	24.2
35	P1HL16	Large	High	60%	1.19	0.453	0.490	8.19%	25.7
33	P1HL14	Large	High	64%	0.79	0.296	0.320	8.23%	23.4
44	P1HL25	Large	High	64%	0.82	0.316	0.343	8.55%	28.1
58	P1HL39	Large	High	70%	0.83	0.336	0.364	8.59%	29.4
42	P1HL23	Large	High	44%	0.98	0.335	0.365	8.77%	37.7
46	P1HL27	Large	High	70%	0.91	0.347	0.378	8.79%	28.1
31	P1HL12	Large	High	50%	0.84	0.315	0.344	9.22%	25.5
2	L10	Large	High	45%	0.90	0.329	0.359	9.28%	16.9
10	L8	Large	High	60%	0.59	0.259	0.283	9.40%	41.4
34	P1HL15	Large	High	49%	0.81	0.332	0.363	9.45%	36.2
66	P1HL47	Large	High	55%	0.66	0.270	0.295	9.53%	45.8
43	P1HL24	Large	High	72%	0.70	0.309	0.339	9.68%	43.6
54	P1HL35	Large	High	100%	0.49	0.205	0.225	9.75%	20.3
39	P1HL20	Large	High	54%	0.66	0.287	0.315	9.76%	35.9
36	P1HL17	Large	High	55%	0.64	0.284	0.311	9.82%	32.6
57	P1HL38	Large	High	59%	0.47	0.238	0.261	9.90%	42.0
59	P1HL40	Large	High	51%	0.51	0.250	0.275	10.07%	48.0
55	P1HL36	Large	High	40%	0.94	0.364	0.401	10.10%	11.5
47	P1HL28	Large	High	51%	0.58	0.289	0.318	10.21%	43.6
38	P1HL19	Large	High	50%	0.63	0.289	0.318	10.24%	40.8
11	L9	Large	High	57%	0.53	0.247	0.273	10.31%	44.7
60	P1HL41	Large	High	71%	0.31	0.233	0.257	10.31%	45.8
48	P1HL29	Large	High	55%	0.54	0.255	0.281	10.38%	48.2
69	P1HL50	Large	High	50%	0.47	0.256	0.283	10.50%	34.7
49	P1HL30	Large	High	50%	0.44	0.247	0.273	10.62%	33.0
61	P1HL42	Large	High	43%	0.59	0.312	0.345	10.67%	33.4
56	P1HL37	Large	High	78%	0.48	0.288	0.319	10.67%	60.2
63	P1HL44	Large	High	50%	0.46	0.248	0.275	10.70%	48.5
8	L6	Large	High	64%	0.42	0.219	0.243	10.77%	49.8
4	P1HL45	Large	High	60%	0.37	0.236	0.261	10.82%	52.4
3	L11	Large	High	61%	0.43	0.207	0.230	10.94%	44.8
40	P1HL21	Large	High	51%	0.47	0.241	0.268	10.96%	22.8
62	P1HL43	Large	High	62%	0.19	0.233	0.259	10.98%	31.3
6	L4	Large	High	50%	0.41	0.255	0.284	11.09%	47.6
37	P1HL18	Large	High	45%	0.36	0.248	0.276	11.15%	39.9
5	L3	Large	High	75%	0.47	0.284	0.315	11.21%	42.0
68	P1HL49	Large	High	73%	0.20	0.236	0.262	11.24%	81.4
51	P1HL32	Large	High	93%	0.25	0.170	0.190	11.40%	66.4
65	P1HL46	Large	High	86%	0.23	0.170	0.190	11.50%	66.2
50	P1HL31	Large	High	74%	0.19	0.180	0.201	11.82%	55.5
70	P1HL51	Large	High	57%	0.33	0.267	0.299	11.87%	50.1
4	L2	Large	High	85%	0.46	0.295	0.331	11.96%	52.3
67	P1HL48	Large	High	98%	0.23	0.128	0.143	12.03%	44.2
7	L5	Large	High	67%	0.28	0.186	0.208	12.15%	50.9
53	P1HL34	Large	High	77%	0.23	0.146	0.166	13.63%	45.7
52	P1HL33	Large	High	62%	0.25	0.127	0.150	17.86%	50.6
45	P1HL26	Large	High	100%	1.22	0.433	0.512	18.27%	23.9
1	L1	Large	Low	55%	0.39	0.347	0.392	12.99%	52.5
93	P1HM82	Medium	High	41%	0.78	0.324	0.354	9.14%	36.7
72	P1HM61	Medium	High	41%	0.78	0.315	0.344	9.41%	19.6
97	P1HM86	Medium	High	63%	0.25	0.275	0.302	9.82%	67.0
103	P1HM92	Medium	High	58%	0.57	0.275	0.303	9.90%	51.3
110	P1HM99	Medium	High	100%	0.20	0.204	0.225	9.94%	52.0
22	M19	Medium	High	51%	0.58	0.261	0.287	10.04%	48.1
24	M20	Medium	High	58%	0.54	0.240	0.265	10.04%	47.8
84	P1HM73	Medium	High	57%	0.47	0.227	0.250	10.04%	40.4
99	P1HM88	Medium	High	51%	0.58	0.254	0.280	10.18%	41.2
85	P1HM74	Medium	High	59%	0.51	0.249	0.275	10.19%	44.0
21	M18	Medium	High	61%	0.41	0.228	0.251	10.21%	41.6
105	P1HM94	Medium	High	63%	0.25	0.249	0.274	10.22%	59.9
104	P1HM93	Medium	High	54%	0.57	0.273	0.301	10.22%	38.1
74	P1HM83	Medium	High	61%	0.25	0.217	0.240	10.28%	82.0
88	P1HM97	Medium	High	50%	0.50	0.280	0.309	10.47%	41.5
87	P1HM76	Medium	High	50%	0.45	0.269	0.298	10.75%	46.3

Tang Homework Attachment
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Number of Observation	Publication ID	Size	Density	Editorial %	Piece Weight	Current Postage per Piece	Proposed Postage per Piece	% Change	Sacked Portion	
									Average Pc per Sack	
20	M17	Medium	High	50%	0.49	0.295	0.327	10.77%		46.5
	P1HM77	Medium	High	54%	0.58	0.331	0.367	10.98%		40.2
	P1HM95	Medium	High	50%	0.45	0.227	0.252	11.03%		53.8
18	M15	Medium	High	51%	0.76	0.447	0.497	11.16%		28.0
81	P1HM70	Medium	High	47%	0.89	0.433	0.481	11.19%		39.6
71	P1HM100	Medium	High	86%	2.31	0.674	0.750	11.25%		26.2
17	M14	Medium	High	41%	0.98	0.498	0.554	11.32%		41.1
14	M11	Medium	High	85%	0.40	0.290	0.324	11.76%		57.0
82	P1HM71	Medium	High	37%	2.29	1.068	1.195	11.84%		19.0
74	P1HM63	Medium	High	50%	0.92	0.504	0.564	11.89%		36.8
15	M12	Medium	High	100%	0.57	0.282	0.316	11.99%		37.6
109	P1HM98	Medium	High	78%	1.11	0.458	0.514	12.42%		39.1
75	P1HM64	Medium	High	80%	0.79	0.358	0.402	12.47%		38.1
90	P1HM79	Medium	High	51%	0.40	0.254	0.286	12.48%		46.5
95	P1HM84	Medium	High	92%	0.36	0.269	0.303	12.54%		54.5
77	P1HM66	Medium	High	88%	0.39	0.283	0.319	12.82%		60.1
78	P1HM67	Medium	High	85%	0.34	0.244	0.276	12.85%		52.0
91	P1HM80	Medium	High	72%	0.24	0.243	0.274	12.89%		41.4
79	P1HM68	Medium	High	70%	0.61	0.370	0.418	13.03%		43.6
102	P1HM91	Medium	High	60%	0.41	0.310	0.351	13.20%		46.8
98	P1HM87	Medium	High	61%	0.50	0.362	0.410	13.21%		41.8
107	P1HM96	Medium	High	57%	0.34	0.280	0.318	13.54%		47.4
92	P1HM81	Medium	High	95%	0.24	0.222	0.252	13.54%		48.0
83	P1HM72	Medium	High	42%	0.36	0.364	0.413	13.58%		48.6
16	M13	Medium	High	62%	0.18	0.234	0.266	13.60%		29.8
101	P1HM90	Medium	High	100%	0.38	0.255	0.290	13.71%		42.6
86	P1HM75	Medium	High	100%	1.72	0.528	0.603	14.21%		34.9
100	P1HM89	Medium	High	49%	0.36	0.341	0.390	14.29%		43.6
76	P1HM65	Medium	High	100%	0.09	0.213	0.243	14.36%		59.2
73	P1HM62	Medium	High	94%	0.23	0.228	0.261	14.56%		49.8
80	P1HM69	Medium	High	76%	0.31	0.273	0.313	14.77%		45.2
9	P1HM78	Medium	High	82%	0.62	0.370	0.428	15.71%		37.9
	P1HM85	Medium	High	57%	0.32	0.361	0.420	16.53%		45.5
9	M16	Medium	High	50%	0.42	0.325	0.381	17.17%		13.0
134	P1LM44	Medium	Low	52%	0.60	0.301	0.329	9.28%		42.2
13	M10	Medium	Low	57%	0.56	0.254	0.279	9.90%		45.6
28	M7	Medium	Low	61%	0.65	0.325	0.357	9.96%		32.4
132	P1LM42	Medium	Low	60%	0.35	0.236	0.260	10.22%		51.0
29	M8	Medium	Low	50%	0.49	0.275	0.304	10.52%		24.7
30	M9	Medium	Low	62%	0.42	0.209	0.231	10.79%		45.9
135	P1LM45	Medium	Low	35%	0.96	0.425	0.471	10.89%		21.9
27	M6	Medium	Low	45%	1.20	0.561	0.625	11.35%		32.1
120	P1LM30	Medium	Low	44%	0.43	0.307	0.342	11.39%		43.8
26	M5	Medium	Low	27%	2.00	0.983	1.096	11.45%		25.6
111	P1LM21	Medium	Low	65%	0.79	0.416	0.467	12.01%		37.5
25	M3	Medium	Low	50%	0.70	0.470	0.529	12.60%		30.3
126	P1LM36	Medium	Low	60%	0.33	0.373	0.420	12.64%		40.4
129	P1LM39	Medium	Low	75%	0.62	0.462	0.521	12.81%		41.1
137	P1LM47	Medium	Low	81%	0.30	0.224	0.253	13.03%		48.6
124	P1LM34	Medium	Low	53%	0.64	0.449	0.509	13.15%		36.9
145	P1LM55	Medium	Low	50%	0.40	0.368	0.417	13.19%		50.3
118	P1LM28	Medium	Low	59%	0.72	0.412	0.467	13.36%		42.2
125	P1LM35	Medium	Low	50%	0.37	0.360	0.408	13.39%		54.4
143	P1LM53	Medium	Low	70%	0.41	0.336	0.381	13.52%		47.7
140	P1LM50	Medium	Low	77%	0.63	0.376	0.428	13.60%		45.4
130	P1LM40	Medium	Low	75%	0.24	0.304	0.346	13.63%		53.4
142	P1LM52	Medium	Low	52%	0.53	0.430	0.489	13.85%		45.8
113	P1LM23	Medium	Low	57%	0.79	0.447	0.509	13.96%		32.5
115	P1LM25	Medium	Low	26%	0.97	0.720	0.821	14.08%		24.0
112	P1LM22	Medium	Low	45%	0.50	0.423	0.483	14.18%		43.9
151	M4	Medium	Low	40%	0.53	0.427	0.488	14.19%		41.8
146	P1LM56	Medium	Low	81%	0.24	0.274	0.314	14.61%		54.0
133	P1LM43	Medium	Low	61%	0.49	0.396	0.454	14.70%		43.3
116	P1LM26	Medium	Low	100%	0.32	0.305	0.350	14.76%		47.2
9	P1LM59	Medium	Low	47%	0.44	0.397	0.456	14.83%		42.6
5	P1LM46	Medium	Low	50%	0.31	0.342	0.394	14.93%		44.8
27	P1LM37	Medium	Low	68%	0.48	0.371	0.426	14.93%		45.7

Tang Homework Attachment
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Number of Observation	Publication ID	Size	Density	Editorial %	Piece Weight	Current Postage per Piece	Proposed Postage per Piece	% Change	Sacked Portion Average Pc per Sack
138	P1LM48	Medium	Low	89%	0.31	0.287	0.330	14.95%	51.9
23	P1LM33	Medium	Low	100%	1.13	0.516	0.594	15.20%	35.3
11	P1LM51	Medium	Low	47%	0.31	0.359	0.414	15.29%	45.0
23	M2	Medium	Low	96%	0.38	0.289	0.334	15.74%	45.6
12	M1	Medium	Low	100%	0.45	0.298	0.345	15.76%	43.9
148	P1LM58	Medium	Low	91%	0.13	0.231	0.268	15.82%	48.9
117	P1LM27	Medium	Low	51%	0.31	0.366	0.426	16.35%	44.9
122	P1LM32	Medium	Low	100%	0.53	0.314	0.366	16.41%	41.4
139	P1LM49	Medium	Low	62%	0.60	0.459	0.535	16.41%	64.2
131	P1LM41	Medium	Low	80%	0.24	0.294	0.343	16.44%	40.7
121	P1LM31	Medium	Low	78%	0.24	0.302	0.354	17.30%	36.1
114	P1LM24	Medium	Low	95%	0.15	0.248	0.291	17.39%	43.2
119	P1LM29	Medium	Low	95%	0.15	0.248	0.291	17.39%	43.2
128	P1LM38	Medium	Low	95%	0.15	0.248	0.291	17.39%	43.2
144	P1LM54	Medium	Low	95%	0.15	0.248	0.291	17.39%	43.2
147	P1LM57	Medium	Low	41%	0.45	0.447	0.525	17.40%	41.4
150	P1LM60	Medium	Low	100%	0.44	0.351	0.415	18.41%	80.9
187	QHS36	Small	High	100%	0.06	0.175	0.187	6.73%	132.4
177	QHS26	Small	High	100%	0.10	0.214	0.229	7.30%	80.5
181	QHS30	Small	High	59%	0.20	0.244	0.270	10.57%	47.8
210	QHS59	Small	High	76%	0.31	0.200	0.222	11.31%	49.4
180	QHS29	Small	High	94%	0.25	0.221	0.247	11.92%	48.3
186	QHS35	Small	High	42%	0.30	0.214	0.240	12.14%	47.6
205	QHS54	Small	High	100%	0.18	0.205	0.230	12.23%	60.2
168	S24	Small	High	33%	1.20	0.439	0.494	12.69%	25.2
200	QHS49	Small	High	63%	0.28	0.229	0.260	13.63%	36.6
206	QHS55	Small	High	100%	0.08	0.177	0.201	13.72%	55.2
166	S22	Small	High	90%	0.06	0.138	0.157	13.78%	52.6
195	QHS44	Small	High	61%	0.10	0.227	0.258	13.99%	47.7
167	S23	Small	High	42%	0.48	0.341	0.389	14.19%	40.3
201	QHS50	Small	High	100%	0.32	0.254	0.290	14.19%	54.1
176	QHS25	Small	High	44%	0.20	0.182	0.209	14.57%	39.6
104	QHS53	Small	High	100%	0.52	0.284	0.325	14.61%	59.8
199	QHS48	Small	High	99%	0.67	0.319	0.365	14.64%	49.4
182	QHS31	Small	High	99%	0.77	0.343	0.395	15.07%	46.8
162	S19	Small	High	75%	0.15	0.196	0.226	15.08%	49.0
165	S21	Small	High	35%	0.13	0.261	0.301	15.36%	55.0
193	QHS42	Small	High	66%	0.53	0.358	0.413	15.44%	39.8
178	QHS27	Small	High	79%	0.24	0.278	0.322	15.66%	47.7
209	QHS58	Small	High	100%	0.46	0.265	0.308	16.03%	31.0
198	QHS47	Small	High	70%	0.26	0.275	0.320	16.44%	42.9
208	QHS57	Small	High	50%	0.15	0.239	0.279	16.80%	39.6
183	QHS32	Small	High	83%	1.87	0.707	0.826	16.86%	24.1
159	S16	Small	High	41%	0.28	0.244	0.285	16.98%	35.1
185	QHS34	Small	High	100%	0.55	0.309	0.361	17.14%	44.4
212	QHS61	Small	High	100%	2.64	0.704	0.826	17.20%	12.7
190	QHS39	Small	High	28%	0.13	0.244	0.287	17.64%	35.8
161	S18	Small	High	100%	0.07	0.223	0.262	17.67%	50.9
207	QHS56	Small	High	71%	0.27	0.258	0.304	17.72%	36.5
164	S20	Small	High	26%	1.90	0.682	0.804	17.82%	9.4
192	QHS41	Small	High	100%	0.25	0.279	0.332	19.31%	24.1
202	QHS51	Small	High	26%	1.14	0.637	0.761	19.45%	12.4
194	QHS43	Small	High	100%	1.55	0.570	0.703	23.20%	11.8
196	QHS45	Small	High	100%	0.57	0.340	0.420	23.55%	15.1
188	QHS37	Small	High	82%	0.26	0.261	0.324	23.90%	14.0
203	QHS52	Small	High	100%	0.91	0.431	0.534	23.97%	12.9
156	S13	Small	High	60%	0.46	0.270	0.335	24.03%	17.3
155	S12	Small	High	47%	0.19	0.234	0.291	24.48%	21.3
157	S14	Small	High	71%	0.41	0.269	0.337	25.43%	14.0
184	QHS33	Small	High	26%	0.35	0.366	0.459	25.50%	15.6
197	QHS46	Small	High	100%	0.64	0.364	0.462	26.73%	12.2
211	QHS60	Small	High	72%	0.98	0.502	0.636	26.76%	9.3
191	QHS40	Small	High	81%	0.16	0.248	0.320	28.60%	16.5
189	QHS38	Small	High	43%	0.38	0.345	0.450	30.46%	11.5
179	QHS28	Small	High	65%	0.26	0.262	0.344	31.16%	12.2
54	S11	Small	High	68%	0.16	0.292	0.393	34.38%	10.2
213	QHS62	Small	High	64%	0.37	0.297	0.413	39.18%	9.4

Tang Homework Attachment
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Number of Observation	Publication ID	Size	Density	Editorial %	Piece Weight	Current Postage per Pjece	Proposed Postage per Piece	Sacked Portion	
								% Change	Average Pc per Sack
238	QHS87	Small	Low	83%	0.11	0.356	0.399	12.01%	193.0
36	QHS85	Small	Low	43%	0.63	0.464	0.520	12.10%	39.3
1	QHS70	Small	Low	75%	0.12	0.366	0.411	12.42%	143.3
23	QHS72	Small	Low	40%	1.73	0.887	1.001	12.84%	32.5
222	QHS71	Small	Low	44%	0.08	0.401	0.454	13.09%	88.0
235	QHS84	Small	Low	56%	0.49	0.375	0.425	13.10%	61.0
237	QHS86	Small	Low	95%	0.15	0.316	0.358	13.30%	48.5
219	QHS68	Small	Low	76%	0.13	0.357	0.405	13.39%	71.6
233	QHS82	Small	Low	70%	0.13	0.367	0.419	14.10%	62.8
240	QHS89	Small	Low	47%	0.35	0.424	0.485	14.30%	41.7
245	QHS94	Small	Low	46%	0.39	0.375	0.429	14.38%	45.5
214	QHS63	Small	Low	39%	0.71	0.535	0.612	14.44%	35.4
220	QHS69	Small	Low	34%	0.29	0.362	0.415	14.74%	46.5
158	S15	Small	Low	97%	0.39	0.275	0.315	14.92%	49.4
248	QHS97	Small	Low	65%	0.27	0.321	0.370	15.29%	45.5
241	QHS90	Small	Low	63%	0.56	0.412	0.475	15.32%	39.4
228	QHS77	Small	Low	80%	0.19	0.262	0.302	15.51%	48.9
239	QHS88	Small	Low	50%	0.65	0.451	0.522	15.58%	34.2
153	S10	Small	Low	97%	0.11	0.241	0.280	16.27%	64.2
250	QHS99	Small	Low	67%	0.33	0.356	0.414	16.29%	61.5
225	QHS74	Small	Low	84%	0.59	0.358	0.417	16.46%	38.9
247	QHS96	Small	Low	100%	0.66	0.331	0.386	16.51%	38.5
218	QHS67	Small	Low	87%	0.46	0.335	0.390	16.55%	40.4
226	QHS75	Small	Low	77%	0.45	0.363	0.424	16.82%	39.0
174	S8	Small	Low	59%	0.20	0.320	0.374	16.82%	51.8
170	S4	Small	Low	100%	0.36	0.280	0.328	16.88%	41.0
216	QHS65	Small	Low	99%	0.95	0.410	0.480	16.94%	38.5
217	QHS66	Small	Low	80%	0.17	0.314	0.368	17.01%	98.6
229	QHS78	Small	Low	99%	1.25	0.462	0.541	17.16%	33.0
231	QHS80	Small	Low	66%	0.22	0.324	0.380	17.32%	48.1
230	QHS79	Small	Low	28%	0.12	0.334	0.393	17.57%	41.2
72	S6	Small	Low	86%	1.22	0.517	0.608	17.61%	27.6
5	S9	Small	Low	100%	0.20	0.355	0.418	17.65%	35.5
15	QHS64	Small	Low	92%	0.63	0.460	0.542	17.75%	29.2
224	QHS73	Small	Low	100%	0.23	0.282	0.334	18.25%	47.1
171	S5	Small	Low	100%	2.64	0.808	0.957	18.44%	16.2
173	S7	Small	Low	100%	0.11	0.257	0.305	18.91%	43.5
234	QHS83	Small	Low	100%	0.46	0.328	0.392	19.43%	35.1
160	S17	Small	Low	98%	0.46	0.298	0.357	19.83%	27.9
249	QHS98	Small	Low	55%	1.02	0.530	0.645	21.71%	11.7
243	QHS92	Small	Low	54%	0.23	0.387	0.473	22.15%	16.9
246	QHS95	Small	Low	100%	1.99	0.694	0.858	23.56%	10.4
169	S3	Small	Low	69%	0.18	0.343	0.424	23.74%	16.3
242	QHS91	Small	Low	71%	0.37	0.386	0.481	24.60%	12.8
251	QHS100	Small	Low	72%	0.08	0.291	0.368	26.40%	14.5
227	QHS76	Small	Low	58%	0.33	0.430	0.549	27.70%	11.4
163	S2	Small	Low	75%	0.27	0.302	0.388	28.35%	15.3
232	QHS81	Small	Low	100%	0.56	0.401	0.518	29.21%	10.9
152	S1	Small	Low	65%	0.28	0.317	0.416	31.34%	12.6
244	QHS93	Small	Low	100%	0.24	0.312	0.419	34.11%	10.0

United States Postal Service

**Altaf H. Taufique
(USPS-T-48)**

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

DFC/USPS-T48-21. Do other countries that produce a "Forever Stamp" permit customers to use the stamp as valid postage valued at the current basic rate on letters and parcels of any weight, domestic or international, or do these countries limit use of the "Forever Stamp" to only certain items, such as 20-gram domestic letters? Please explain and identify the countries.

RESPONSE

In the U.K., Royal Mail's equivalent of the Forever Stamp is issued specifically for 1st and 2nd Class "letters" (e.g., up to 5mm in thickness) and "large letters" (e.g., up to 25mm in thickness). (First Class aims for delivery the next working day, Second Class the third working day.) However, the stamp is also valid as general postage in other mail categories.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

DFC/USPS-T48-23. Did the Postal Service survey public opinion on likely public acceptance of a "Forever Stamp" if the stamp were valid only for postage to pay the one-ounce First-Class rate? Please explain.

RESPONSE

Yes. The Forever Stamp is intended only for use on single-piece First-Class Mail letters weighing up to an ounce. This was implied in the market research documented in USPS-LR-L-152, which posed the Forever Stamp as a First-Class Mail letter stamp (see for example question 19 in the market research survey). For more on the Forever Stamp's postage applicability, please see the responses to DBB/USPS-340 and DBP/USPS-510[b].

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

DFC/USPS-T48-24.

- a. Please confirm that customers seeking to mail a one-ounce First-Class letter sometimes place a postage stamp for the current rate (e.g., 39 cents) on the envelope, then bring the envelope to a retail window clerk to discuss options for expediting delivery of the letter. If you do not confirm, please explain.
- b. Please confirm that customers seeking to mail a letter sometimes place a postage stamp for the current rate (e.g., 39 cents) on the envelope, then bring the envelope to a retail window clerk to check the weight. If you do not confirm, please explain.
- c. In the example in (a), suppose that the retail window clerk sells the customer Priority Mail and places the customer's #10 envelope inside an EP-14H Priority Mail envelope. Suppose, further, that the customer had applied a "Forever Stamp" to the envelope. Would this "Forever Stamp" be valid as partial postage payment for the Priority Mail rate? Please explain.
- d. In the example in (b), suppose that the retail window clerk determines that the envelope weighs two ounces. Would the "Forever Stamp" be valid as partial postage payment for the two-ounce First-Class letter rate? Please explain.
- e. Suppose that a customer is sending a #10 envelope that weighs two ounces. The customer, however, places only a single "Forever Stamp" on the envelope and then deposits the envelope in the mail. Suppose, further, that the Postal Service determines that postage is due. If the rate for a two-ounce letter is 62 cents and the value of a "Forever Stamp" is 42 cents, how much postage due would the recipient be charged?

RESPONSE

- (a) Confirmed.
- (b) Confirmed.
- (c) Ordinarily, applicable postage must be affixed to the outside cover of the Priority Mail piece. See DMM 604.1.7. In the circumstance that you describe, it is presumed that the clerk would apprise the customer of this general requirement to avoid future similar occurrences, and then take the time to work with the customer to cancel the Forever Stamp, orient the inside envelope so that the canceled postage showed through the window,

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

RESPONSE to DFC/USPS-T48-24 (continued):

seal the EP-14H, and affix postage to the EP-14H reflecting the difference between the applicable Priority Mail rate and the value of the cancelled Forever Stamp. If the EP-14H is sealed before the Forever Stamp is cancelled, then the sender is not entitled to credit for the value of the Forever Stamp as postage on the Priority Mail piece.

- (d) The response assumes we are addressing the R2006-1 rate cycle and that the rates proposed by the Postal Service in this docket are implemented. In that scenario, applicable postage on the 2-ounce piece would be 62 cents. If your question asks whether a customer who has already applied a 42-cent Forever Stamp would be credited by the acceptance clerk with having paid 42 of the applicable 62 cents, the answer is affirmative.
- (e) The response assumes we are addressing the R2006-1 rate cycle and that the rates proposed by the Postal Service in this docket are implemented. In that scenario, applicable postage on the 2-ounce piece would be 62 cents. If your question asks whether such a piece to which the sender has already applied a 42-cent Forever Stamp will subject the recipient to a 20-cent postage due charge, the answer is affirmative.

United States Postal Service

**Eliane Van-Ty-Smith
(USPS-T-11)**

RESPONSE OF POSTAL SERVICE WITNESS VAN-TY-SMITH
TO POIR NO. 11, QUESTION 6

6. As provided in response to Docket R2005-1, POIR 4, Question 8, please provide a matrix showing a breakdown of allied cost pools showing the number of direct tallies, their associated dollar values, and their percent share of total by piece shapes, item types, and container types for each cost pool as described in direct testimony of witness Van-Ty-Smith, USPS-T-11 at section B.2.3. The breakdown should include uncounted and empty items, identified containers by loose pieces and items, and unidentified and empty containers. Also, identify cells where the recorded direct tally is not used and a broader set of tallies is used to form a distribution key for mixed and not-handling tallies including a description of what is used to create the proxy distribution key.

RESPONSE:

The matrix for the breakdown of all handling tallies is organized into two worksheets in the attached Excel file. The first worksheet shows the dollars associated with each requested category by cost pool and the corresponding percent share of total handling dollars. The second worksheet shows the number of records associated with each requested category by cost pool. Each worksheet consists of four tables showing the requested categories as follows:

Table 1. The direct tallies by piece shapes, bundles, pallets, short pallet boxes, and container (wheeled and non-wheeled) types.

Table 2. The mixed tallies for handlings of bundles and non-wheeled container types, and for handlings of identified pallets, short pallet boxes, and wheeled containers types. Each non-wheeled container type includes a breakdown by uncounted and empty categories. Each pallet, short pallet box, and wheeled container type includes a breakdown by shapes of loose pieces, bundles and non-wheeled container types.

Table 3. The mixed tallies for handlings of unidentified and empty pallets, short pallet boxes and wheeled containers types.

RESPONSE OF POSTAL SERVICE WITNESS VAN-TY-SMITH
TO POIR NO. 11, QUESTION 6

Table 4. The mixed tallies for handlings of tall pallet boxes.

The cells where a broader set of tallies is used for a distribution key are located in Table

2. Those cells include:

- all bundles and non-wheeled containers (uncounted and empty) and all identified pallets, short pallet boxes, and wheeled containers for the BMCS PLA cost pool; and
- all identified pallets, short pallet boxes, and wheeled containers for the MODS 17 1OPTRANS, the MODS 17 1PLATFRM and the PO/STA/BR ALLIED cost pools.

For those cells in Table 2, the direct pallet, short pallet box, and wheeled container tallies are not used in the distribution key. Each piece shape, bundle and non-wheeled container type from Table 2 is distributed in proportion to the subclasses recorded for the same direct piece shape, bundle and non-wheeled container type from Table 1. For example, uncounted/empty flat trays (TRAY_F) and flat trays (TRAY_F) in identified containers in Table 2 are distributed in proportion to the subclasses from direct flat trays (TRAY_F) from Table 1. Parcel pieces (PC_PCL) in identified containers in Table 2 are distributed in proportion to the subclasses from direct parcel pieces (PC_PCL) from Table 1.

The broader set of direct tallies by piece shape, bundle and non-wheeled container type used for each of these four cost pools is as follows:

- for BMCS PLA: direct tallies for all BMC mail processing cost pools, allied as well as non-allied.

RESPONSE OF POSTAL SERVICE WITNESS VAN-TY-SMITH
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- for MODS 17 1OPTRANS and the MODS 17 1PLATFRM: direct tallies for the MODS allied cost pools shown in Table 1, and the MODS 13 1SACKS_M and the MODS 13 1TRAYSRT cost pools.
- for PO/STA/BR ALLIED: direct tallies for the PO/STA/BR mail processing cost pools, allied and non-allied, which exclude the REGISTRY and the MISC cost pools.

Since within a cost pool, each unidentified and empty pallet, short pallet box, and wheeled container type from Table 3 is distributed in proportion to the distributed subclasses for identified pallets, short pallet boxes, and the same type of wheeled containers from Table 2 combined with the recorded subclasses for direct pallets, short pallet boxes and the same type of wheeled containers from Table 1, it follows that the subclasses from the broader set of tallies used for the identified pallets, short pallet boxes, and wheeled containers in BMCS PLA, MODS 17 1OPTRANS, MODS 17 1PLATFRM and PO/STA/BR ALLIED are also reflected in the unidentified and empty pallets, short pallet boxes, and wheeled containers for these four cost pools. Also, since within a cost pool, each tall pallet box from Table 4 is distributed in proportion to the distributed subclasses for all pallets, pallet boxes and wheeled containers from Tables 2 and 3, it follows that the subclasses from the broader set of tallies are also reflected in the tall pallet boxes in these four cost pools.

The aggregate of the recorded subclasses for the direct tallies from Table 1 and the distributed subclasses for the mixed tallies from Tables 2, 3 and 4 constitutes the subclasses for the handling tallies. The not-handling tallies are distributed in proportion to the handling tallies within each allied cost pool, except for the platform cost pools

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BMCS PLA and MODS 17 1PLATFRM, which use a broader set of handling tallies. See USPS-T-11, p.18, lines 1-10, and LR-L-55, Part II for a description of the broad-based distribution keys used in these two platform cost pools.

Table 1. BY05 Direct Tallies (\$-weighted adjusted to the cost pool) by piece shapes: bundles, pallets, short pallet boxes, and container (wheeled and non-wheeled) types

		BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1UTGRPR	MODS 17 1OPBUCK	MODS 17 1OPPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED	Total
Direct Tallies																	
dir pc	PC_CRD	718	-	5,052	768	211	69	255	1,679	380	470	77	-	-	-	2,958	12,839
dir pc	PC_FLT	11,477	740	23,250	6,302	56,973	1,750	9,882	21,824	4,251	14,822	8,122	592	1,635	1,357	22,850	185,827
dir pc	PC_IPP	14,146	2,378	4,347	1,520	752	731	1,855	8,120	276	6,315	12,273	365	2,177	1,603	4,600	61,455
dir pc	PC_LTR	7,950	281	108,078	8,053	1,674	5,912	10,181	31,369	6,117	14,686	3,236	1,825	1,251	834	38,357	239,803
dir pc	PC_PCL	24,094	5,860	4,043	2,794	1,373	201	2,264	10,984	526	17,120	9,025	901	4,778	5,827	13,289	103,078
dir item	BUNDLE	5,330	1,501	2,822	6,676	81,058	1,421	24,053	24,080	2,083	16,963	8,256	1,272	5,610	1,644	40,800	223,669
dir item	CONCON	-	-	-	-	-	-	-	-	-	139	-	-	-	-	-	139
dir item	OTHR_I	176	388	-	-	77	-	77	81	73	677	5	-	-	-	339	1,893
dir item	SCKB_O	64	-	69	-	-	-	103	263	-	1,152	90	-	200	383	105	2,428
dir item	SCKBWN	1,662	874	74	1,138	300	-	917	2,674	78	2,255	1,141	-	2,858	-	801	14,772
dir item	SCKGRN	67	-	69	146	-	-	75	129	-	819	1,427	-	264	441	1,655	5,093
dir item	SCKINT	-	68	-	-	-	-	75	8	-	89	22	-	14	170	-	446
dir item	SCKO_Y	271	224	67	1,041	304	-	305	1,949	75	2,404	808	85	1,937	4,479	668	14,619
dir item	SCKOTH	-	269	-	-	-	66	-	-	-	72	109	-	-	-	-	515
dir item	SCKWH	2,518	2,045	83	345	218	127	2,092	1,337	75	1,794	246	-	1,795	73	911	13,659
dir item	SCKWH1	2,196	2,411	69	365	250	-	1,264	969	304	1,467	739	126	1,655	-	2,249	14,065
dir item	TRAY_F	989	726	5,931	14,237	8,165	1,315	4,975	14,185	1,771	13,895	1,708	652	1,860	3,895	30,598	104,901
dir item	TRAY_L	12,978	4,337	8,848	20,381	1,589	2,717	28,829	57,523	6,175	26,307	4,373	3,847	3,014	6,817	17,993	205,727
dir item	TRAY_P	365	107	136	84	-	66	230	437	75	516	-	-	135	-	290	2,441
dir Cont	AIR CARG	71	67	-	-	-	-	-	-	-	69	-	-	-	-	-	207
dir Cont	BMC_OTR	836	2,052	74	220	-	-	667	589	-	2,197	-	-	138	-	150	6,922
dir Cont	ERMC/GPC	359	968	202	1,326	252	138	1,538	3,795	1,474	10,796	228	-	603	153	1,965	23,797
dir Cont	FLATCART	-	-	-	72	1,184	-	-	479	461	209	-	-	-	-	145	2,550
dir Cont	HAMPER	141	472	676	154	850	-	157	783	158	3,479	153	117	202	-	1,822	9,162
dir Cont	NOTIN CN	1,037	1,668	242	734	723	133	619	2,336	243	3,889	625	-	454	358	229	13,290
dir Cont	NUT TRCK	-	137	-	229	134	-	390	788	605	354	79	223	266	-	-	3,206
dir Cont	PALLET	2,101	11,058	205	547	303	236	2,291	2,040	468	20,253	412	866	693	-	3,433	44,908
dir Cont	PALLET1	352	7,395	144	345	384	68	653	1,081	470	11,307	149	-	386	68	974	23,776
dir Cont	U-CART	-	-	-	-	157	-	-	234	58	525	-	-	-	-	453	1,427
dir Cont	WIRETAIN	200	475	-	270	-	89	310	153	222	1,108	77	-	184	-	140	3,504
dir Cont	Z-OTH CN	72	292	69	-	58	-	229	107	-	207	-	-	-	-	-	1,034
Total for Table 1		90,167	46,892	164,549	67,747	157,268	15,039	94,286	189,998	26,419	176,354	53,381	10,871	32,106	28,101	187,774	1,340,953

Table 2 BY 05 Mixed Tallies (\$-weighted adjusted to the cost pool) by Single Bundles and Non-Wheeled Container Types, and by Piece Shapes, Bundles and Non-Wheeled Types for Identified Pallets, Short Pallet Boxes, and Wheeled Container Types

	BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPR	MODS 17 1HTRPREP	MODS 17 1OPBULK	MODS 17 1OPPREF	MODS 17 1OPTTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED	Total
Mixed Tallies for Single Bundles and Non-Wheeled Container Types																
BUNDLE	616	72	-	-	72	1,440	477	212	-	-	162	-	-	-	810	3,861
CONCON	uncntd	-	-	-	74	-	-	-	-	350	-	-	-	-	-	425
OTHR_I	104	299	67	72	-	-	-	-	-	1,208	-	-	68	-	-	1,318
SCKB_O	uncntd	-	-	-	-	-	-	213	-	156	-	-	67	7	202	645
SCKBWN	uncntd	72	-	72	-	-	-	156	-	70	-	-	335	-	372	1,075
SCKGRN	uncntd	-	-	98	-	-	-	153	-	235	105	-	-	-	588	1,179
SCKO_Y	uncntd	-	-	151	-	-	115	257	-	640	177	-	68	966	75	2,451
SCKOTH	uncntd	45	-	-	-	-	77	-	-	-	-	-	67	-	-	189
SCKWH	uncntd	128	64	-	-	-	82	76	-	265	471	-	194	-	342	1,621
SCKWH1	uncntd	559	249	-	145	-	-	233	-	72	10	-	456	-	748	2,471
TRAY_F	uncntd	-	-	72	-	-	75	109	-	95	-	-	-	-	-	351
TRAY_L	uncntd	64	-	-	-	-	-	105	-	-	-	-	-	-	-	169
TRAY_P	uncntd	-	72	-	-	101	-	76	-	-	-	-	253	-	-	727
CONCON	Empty	-	-	151	-	-	-	-	-	387	74	-	-	-	-	612
OTHR_I	Empty	279	474	67	218	302	72	346	823	158	2,261	136	67	-	519	5,723
SCKB_O	Empty	-	-	137	-	-	-	308	-	253	-	-	132	71	-	901
SCKBWN	Empty	-	-	-	175	-	-	160	472	153	178	-	269	-	281	2,442
SCKGRN	Empty	-	-	70	278	-	-	182	338	-	2,105	-	51	-	488	3,730
SCKINT	Empty	-	72	-	14	-	-	113	-	81	28	13	141	371	-	833
SCKO_Y	Empty	-	-	456	77	-	154	1,033	243	804	626	119	256	63	140	3,971
SCKOTH	Empty	-	72	-	-	-	-	76	-	-	-	-	66	-	-	214
SCKWH	Empty	181	72	67	151	74	-	340	258	-	848	1,111	-	202	-	3,942
SCKWH1	Empty	1,271	-	-	-	-	-	411	381	-	352	877	-	787	67	883
TRAY_F	Empty	210	139	1,226	1,548	3,045	-	387	3,102	1,050	3,738	290	275	199	3,615	18,824
TRAY_L	Empty	766	229	1,971	1,472	156	354	2,085	5,435	628	3,210	285	157	200	1,320	21,223
TRAY_P	Empty	240	-	-	-	-	-	159	-	-	140	-	-	-	-	539
Subtotal	4,463	1,884	3,606	5,220	5,195	426	4,888	14,087	2,232	15,701	7,296	290	3,955	3,063	12,659	84,965
Mixed Tallies for Identified Pallets, Short Pallet Boxes, and Wheeled Container Types																
AIR CARG	BUNDLE	-	-	-	-	-	-	-	-	72	-	-	-	-	-	72
AIR CARG	CONCON	-	-	-	-	-	-	-	-	98	-	-	-	-	-	98
AIR CARG	OTHR_I	-	-	-	-	-	-	-	-	82	-	-	-	-	-	82
AIR CARG	PC_FLT	-	-	-	77	146	-	-	103	-	-	-	-	-	158	484
AIR CARG	PC_IPP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
AIR CARG	PC_LTR	-	-	-	-	-	-	-	-	-	-	-	-	71	-	71
AIR CARG	PC_PCL	-	-	-	-	-	-	-	-	266	-	-	-	-	-	421
AIR CARG	SCKB_O	-	-	-	-	-	-	154	-	75	-	-	-	-	-	75
AIR CARG	SCKINT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
AIR CARG	SCKO_Y	-	-	-	-	-	-	76	-	733	-	-	-	-	-	809
AIR CARG	SCKOTH	-	-	-	-	-	-	-	-	54	-	-	-	-	-	54
AIR CARG	TRAY_F	-	-	-	-	-	-	-	-	134	-	-	-	-	-	134
AIR CARG	TRAY_L	-	-	-	-	-	-	-	-	44	-	-	-	-	-	44
AIR CARG	TRAY_P	-	-	-	-	-	-	-	-	9	-	-	-	-	-	102
BMC-OTR	BUNDLE	-	53	-	-	109	859	215	59	814	-	-	262	-	232	2,601
BMC-OTR	CONCON	-	-	-	-	-	-	-	-	34	-	-	-	-	-	34
BMC-OTR	OTHR_I	64	179	-	76	-	-	-	-	273	-	-	-	-	100	691
BMC-OTR	PALLET	-	165	-	-	-	-	-	-	263	-	-	-	-	-	428
BMC-OTR	PC_CRD	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
BMC-OTR	PC_FLT	58	125	21	-	117	-	31	40	846	-	-	25	-	388	1,651
BMC-OTR	PC_IPP	314	236	-	-	-	62	181	-	1,193	80	-	90	61	250	2,466
BMC-OTR	PC_LTR	11	87	116	84	-	60	99	-	362	-	-	-	71	-	889
BMC-OTR	PC_PCL	3,841	9,188	455	389	155	66	233	880	100	13,679	442	528	283	5,983	36,223
BMC-OTR	SCKB_O	-	-	-	-	-	-	-	-	575	-	-	-	6	-	581
BMC-OTR	SCKBWN	72	100	-	37	-	-	317	151	662	81	-	160	-	164	1,744
BMC-OTR	SCKGRN	-	-	-	37	-	-	-	8	201	-	-	66	-	-	312
BMC-OTR	SCKINT	-	-	-	-	-	-	31	-	35	-	-	7	-	-	72

BMC-OTR	SCKO_Y	-	64	55	147	-	-	164	220	4 064	93	-	190	580	-	5,787
BMC-OTR	SCKOTH	170	825	-	10	-	-	-	-	277	-	-	41	-	35	1,387
BMC-OTR	SCKWH	12	831	-	-	-	-	85	-	743	4	-	160	-	31	2,034
BMC-OTR	SCKWH1	137	1 932	-	-	-	-	77	-	794	-	-	197	-	240	3,661
BMC-OTR	TRAY_F	100	539	-	424	151	-	891	280	4,417	-	-	209	270	1,119	8,755
BMC-OTR	TRAY_L	847	1 613	95	495	-	-	972	162	6,277	-	-	204	135	638	11,895
BMC-OTR	TRAY_P	165	88	67	-	-	-	-	23	868	15	-	-	-	111	1,338
ERMC/GPC	BUNDLE	-	-	35	87	210	-	446	340	2,113	100	122	119	-	2,104	5,777
ERMC/GPC	CONCON	-	-	-	-	-	-	-	-	170	-	-	-	-	-	170
ERMC/GPC	OTHR_I	33	93	14	154	-	-	81	76	416	79	-	-	-	419	1,442
ERMC/GPC	PALLET	-	8	-	-	-	-	-	-	30	-	-	-	-	-	38
ERMC/GPC	PC_CRD	-	-	21	74	-	-	4	-	98	-	-	-	-	24	221
ERMC/GPC	PC_FLT	-	84	368	436	472	-	81	1 457	518	5,313	26	-	315	92	3,509
ERMC/GPC	PC_IPP	82	102	73	174	38	-	336	15	1,837	62	-	188	1	531	3,438
ERMC/GPC	PC_LTR	-	-	284	331	80	17	75	1,227	802	4,834	-	119	146	121	1,602
ERMC/GPC	PC_PCL	849	4 608	490	890	352	132	9	2,278	614	21,101	452	75	982	413	7,636
ERMC/GPC	SCKB_O	-	-	20	-	-	-	-	237	-	1,766	138	-	152	-	33
ERMC/GPC	SCKBWN	-	239	13	32	-	-	40	256	-	1,866	-	165	186	-	316
ERMC/GPC	SCKGRN	-	-	7	41	-	-	89	32	75	1,176	101	-	41	3	212
ERMC/GPC	SCKINT	-	-	-	72	-	-	-	33	-	-	5	-	-	-	110
ERMC/GPC	SCKO_Y	-	-	16	188	-	-	120	529	380	4,105	66	-	296	423	316
ERMC/GPC	SCKOTH	-	-	-	49	-	-	-	80	-	436	-	-	64	7	334
ERMC/GPC	SCKWH	-	148	4	80	-	-	23	164	85	1,771	4	-	479	-	773
ERMC/GPC	SCKWH1	106	102	7	112	-	-	-	101	17	944	8	-	235	-	986
ERMC/GPC	TRAY_F	85	458	1 608	4 440	2 990	395	778	7,176	3,996	41,080	453	454	1,333	951	19,102
ERMC/GPC	TRAY_L	470	1,452	2 255	8 121	5 17	636	5 022	23 026	10,721	62,998	1,633	2,647	1,978	839	17,213
ERMC/GPC	TRAY_P	40	251	191	-	-	-	-	253	199	2,954	19	-	74	-	620
FLATCART	BUNDLE	-	-	-	95	670	-	-	103	76	141	-	-	-	-	118
FLATCART	OTHR_I	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FLATCART	PC_CRD	-	-	-	74	-	-	-	-	-	-	-	-	-	-	74
FLATCART	PC_FLT	-	-	204	221	6 972	65	1 220	1,527	2,361	2,692	73	-	72	-	918
FLATCART	PC_IPP	-	-	-	-	-	-	-	25	-	104	-	-	-	-	129
FLATCART	PC_LTR	-	-	-	-	3	-	-	-	-	-	-	-	-	-	3
FLATCART	PC_PCL	-	-	-	-	75	-	-	128	-	24	-	-	-	-	227
FLATCART	SCKINT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FLATCART	TRAY_F	68	-	70	158	939	-	50	77	377	70	79	-	-	615	2,503
FLATCART	TRAY_L	-	-	-	156	13	-	-	-	-	24	-	-	-	-	192
FLATCART	TRAY_P	-	-	-	-	-	-	-	-	-	24	-	-	-	-	27
HAMPER	BUNDLE	98	142	63	587	2,509	-	1,077	1,270	233	5,432	221	-	383	-	1,775
HAMPER	CONCON	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
HAMPER	OTHR_I	92	-	18	98	-	-	-	-	-	210	-	-	-	-	470
HAMPER	PC_CRD	-	85	388	-	-	16	-	70	-	220	-	-	22	63	260
HAMPER	PC_FLT	337	253	1,157	103	572	77	112	743	594	3,541	50	142	109	27	1,695
HAMPER	PC_IPP	75	173	250	504	116	16	130	870	158	1,283	185	-	160	-	364
HAMPER	PC_LTR	50	241	9,188	219	11	537	149	1,458	364	5,792	91	-	417	78	8,086
HAMPER	PC_PCL	452	967	847	525	89	100	236	2,206	179	8,356	1,299	-	849	210	2,410
HAMPER	SCKB_O	-	-	-	-	-	-	43	-	-	559	-	-	10	-	612
HAMPER	SCKBWN	-	-	-	30	50	-	-	80	75	158	-	-	5	-	28
HAMPER	SCKGRN	-	-	-	56	-	-	-	-	-	77	77	-	-	-	209
HAMPER	SCKINT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
HAMPER	SCKO_Y	-	-	10	-	-	-	-	82	-	652	24	-	44	13	385
HAMPER	SCKOTH	-	-	-	-	-	-	-	-	-	75	141	-	64	-	245
HAMPER	SCKWH	-	-	-	37	-	-	-	-	-	52	76	-	-	-	164
HAMPER	SCKWH1	-	-	-	-	-	-	-	159	-	-	-	-	-	-	134
HAMPER	TRAY_F	-	85	698	774	376	148	128	1,993	1,190	4,250	70	-	267	86	3,567
HAMPER	TRAY_L	40	67	476	655	77	508	494	1,332	1,085	3,912	97	121	259	22	1,710
HAMPER	TRAY_P	-	14	102	-	40	-	23	93	-	930	39	-	-	65	406
NOTIN CN	BUNDLE	154	79	117	138	494	-	240	295	175	727	143	-	48	-	314
NOTIN CN	CONCON	-	-	-	-	-	-	-	-	-	52	-	-	-	-	52
NOTIN CN	OTHR_I	99	93	105	23	11	-	-	10	-	273	-	75	67	26	782
NOTIN CN	PALLET	72	288	-	-	-	-	38	-	-	891	-	-	-	-	1,289
NOTIN CN	PC_CRD	-	-	24	45	-	28	41	93	-	39	-	-	-	-	17

NOTIN CN	PC_FLT	178	125	307	427	558	712	142	337	209	779	114	35	60	-	577	4,389
NOTIN CN	PC_IPP	14	79	189	46	179	31	31	92	15	298	39	23	-	-	140	987
NOTIN CN	PC_LTR	73	54	536	463	-	18	97	299	120	607	79	108	22	-	1,334	3,979
NOTIN CN	PC_PCL	264	285	370	145	-	-	232	456	30	1,548	52	-	205	45	398	4,029
NOTIN CN	SCKB_O	-	-	10	4	-	-	-	-	-	184	-	-	66	-	5	268
NOTIN CN	SCKBWN	31	116	-	72	-	-	-	387	-	89	-	-	61	-	76	833
NOTIN CN	SCKGRN	-	-	-	11	-	-	-	26	-	84	-	-	-	-	5	126
NOTIN CN	SCKINT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
NOTIN CN	SCKO_Y	-	-	41	-	-	-	-	155	-	389	-	-	-	-	128	713
NOTIN CN	SCKOTH	93	38	1	34	-	-	-	23	-	5	-	-	-	-	-	194
NOTIN CN	SCKWH	48	34	-	18	-	-	-	7	-	98	-	-	26	-	-	231
NOTIN CN	SCKWH1	119	322	-	33	-	-	-	-	73	52	-	88	23	19	-	730
NOTIN CN	TRAY_F	-	99	275	579	176	96	41	562	-	1,424	76	-	166	138	711	4,343
NOTIN CN	TRAY_L	260	309	314	883	-	175	475	1,336	156	1,354	-	29	211	325	815	6,644
NOTIN CN	TRAY_P	32	-	54	18	-	-	-	65	141	1,173	8	-	47	51	174	1,763
NUT TRCK	BUNDLE	-	-	-	-	72	-	-	-	-	57	74	-	-	-	496	698
NUT TRCK	CONCON	-	-	-	79	-	-	-	-	-	76	-	-	-	-	155	155
NUT TRCK	OTHR_I	-	24	-	16	-	-	-	-	-	-	-	-	-	-	-	40
NUT TRCK	PALLET	-	-	-	-	-	-	-	-	-	7	-	-	-	-	-	7
NUT TRCK	PC_FLT	-	-	152	-	438	-	151	394	78	1,012	80	-	7	71	180	2,563
NUT TRCK	PC_IPP	-	-	-	-	-	-	-	-	-	60	-	-	-	-	-	60
NUT TRCK	PC_LTR	-	-	-	155	25	-	73	76	307	229	-	-	-	-	-	865
NUT TRCK	PC_PCL	216	143	-	-	-	-	-	162	18	168	5	-	74	7	206	998
NUT TRCK	SCKB_O	-	-	-	-	-	-	-	83	-	129	5	-	-	-	217	217
NUT TRCK	SCKBWN	-	-	-	65	-	-	-	-	75	219	-	-	190	-	65	614
NUT TRCK	SCKGRN	-	-	-	-	-	-	-	-	-	-	77	-	-	-	-	77
NUT TRCK	SCKINT	-	-	-	-	-	-	-	8	-	-	5	-	7	-	-	19
NUT TRCK	SCKO_Y	-	-	-	95	-	-	-	-	-	319	5	-	119	68	-	606
NUT TRCK	SCKOTH	-	64	-	-	-	-	-	-	-	-	-	-	-	-	-	64
NUT TRCK	SCKWH	13	72	-	-	-	-	-	81	-	129	-	-	-	-	-	295
NUT TRCK	SCKWH1	-	461	-	7	-	-	-	-	-	100	153	-	-	-	-	723
NUT TRCK	TRAY_F	-	-	224	996	983	98	179	1,900	841	2,305	303	-	185	158	1,116	9,286
NUT TRCK	TRAY_L	64	-	222	701	103	165	1,414	3,216	1,710	2,654	5	506	66	66	108	10,999
NUT TRCK	TRAY_P	-	-	-	-	-	-	-	-	18	-	-	-	-	-	-	18
PALLET	BUNDLE	-	24	-	-	-	-	-	61	-	545	-	-	-	-	-	630
PALLET	OTHR_I	-	68	-	-	-	-	-	-	-	70	-	-	-	-	-	138
PALLET	PC_CRD	-	98	-	-	-	-	-	-	-	-	-	-	-	-	-	98
PALLET	PC_FLT	-	163	-	-	-	-	-	-	-	141	-	-	-	-	-	365
PALLET	PC_IPP	-	-	-	-	-	-	-	-	-	70	-	-	-	-	61	70
PALLET	PC_LTR	-	-	-	-	-	-	-	-	-	139	-	-	-	-	-	139
PALLET	PC_PCL	270	510	-	-	-	-	-	-	-	374	-	-	-	-	651	1,806
PALLET	SCKBWN	-	-	-	-	-	-	-	-	-	70	-	-	-	-	-	70
PALLET	SCKOTH	-	68	-	-	-	-	-	-	-	71	-	-	-	-	-	139
PALLET	SCKWH	-	72	-	-	-	-	-	-	-	-	-	-	-	-	-	72
PALLET	SCKWH1	-	-	-	-	-	-	-	-	-	72	-	-	-	-	-	72
PALLET	TRAY_F	-	92	-	-	-	-	73	-	-	285	-	-	-	-	-	450
PALLET	TRAY_L	621	1,378	-	184	-	-	-	162	75	1,249	-	-	67	-	105	3,841
PALLET1	BUNDLE	-	501	-	-	39	-	123	125	139	2,517	109	-	66	-	105	3,724
PALLET1	OTHR_I	-	68	-	-	-	-	-	-	-	96	-	-	-	-	-	164
PALLET1	PALLET	-	-	-	-	-	-	-	-	-	71	-	-	-	-	-	71
PALLET1	PC_CRD	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PALLET1	PC_FLT	-	461	-	-	39	-	41	62	-	828	40	-	67	-	101	1,639
PALLET1	PC_IPP	138	-	-	-	-	-	-	78	18	82	-	-	-	-	-	316
PALLET1	PC_LTR	-	-	70	-	-	-	-	-	-	92	-	-	-	-	-	162
PALLET1	PC_PCL	206	788	-	-	-	-	77	152	109	1,915	13	-	66	66	267	3,658
PALLET1	SCKBWN	-	-	-	-	-	-	-	59	-	188	-	-	-	-	-	246
PALLET1	SCKO_Y	-	-	-	-	-	-	-	-	-	71	-	-	-	-	-	71
PALLET1	SCKWH	-	104	-	-	-	-	-	-	-	-	-	-	-	-	-	104
PALLET1	SCKWH1	-	229	-	-	-	-	-	-	-	47	-	-	90	-	-	367
PALLET1	TRAY_F	-	214	-	-	-	-	-	20	-	339	55	-	-	-	-	627
PALLET1	TRAY_L	-	525	-	106	-	-	50	-	83	270	109	-	-	-	-	1,143
PALLET1	TRAY_P	-	93	-	-	-	-	-	71	-	182	-	-	-	-	-	347

U-CART	BUNDLE	-	-	67	-	-	-	51	75	167	80	-	-	-	72	694
U-CART	OTHR_I	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
U-CART	PC_CRD	-	-	4	12	-	-	-	8	-	-	-	-	-	-	24
U-CART	PC_FLT	-	-	34	70	-	-	42	214	52	355	-	-	-	232	1,453
U-CART	PC_IPP	-	-	70	24	-	-	13	-	113	155	-	-	88	109	484
U-CART	PC_LTR	-	-	441	113	-	-	312	74	205	79	-	-	-	745	1,969
U-CART	PC_PCL	3	-	-	5	-	-	127	81	122	90	-	-	-	128	556
U-CART	SCKB_O	-	-	-	-	-	-	76	-	-	-	-	-	-	-	76
U-CART	SCKBWN	-	-	-	-	-	-	-	-	141	-	-	-	-	-	141
U-CART	SCKGRN	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
U-CART	SCKO_Y	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
U-CART	SCKOTH	-	-	-	-	-	-	-	1	-	-	-	-	67	-	67
U-CART	SCKWH	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1
U-CART	SCKWH1	64	-	-	-	-	-	-	-	-	-	-	-	-	-	64
U-CART	TRAY_F	-	-	88	-	151	-	75	76	3	297	-	-	-	185	878
U-CART	TRAY_L	-	-	363	407	-	-	220	998	1,012	1,166	77	-	-	233	4,476
U-CART	TRAY_P	-	-	-	-	-	-	-	-	-	-	-	-	75	209	284
WIRETAIN	BUNDLE	321	690	26	229	825	-	452	712	293	4,650	63	-	199	1,010	10,469
WIRETAIN	OTHR_I	-	-	-	-	-	-	-	-	-	4	-	-	-	-	4
WIRETAIN	PC_CRD	-	-	-	-	-	-	-	-	-	39	-	-	-	10	49
WIRETAIN	PC_FLT	-	274	-	352	792	-	92	379	226	1,186	64	-	45	759	4,169
WIRETAIN	PC_IPP	303	5	44	37	-	-	88	271	-	513	229	-	18	29	1,538
WIRETAIN	PC_LTR	-	43	438	-	19	-	6	-	-	337	-	-	66	364	1,273
WIRETAIN	PC_PCL	521	926	137	231	33	-	82	684	163	3,891	123	-	333	68	560
WIRETAIN	SCKB_O	-	-	-	72	-	-	-	-	-	116	-	-	3	-	191
WIRETAIN	SCKBWN	-	-	-	-	-	-	-	152	-	593	5	-	66	139	955
WIRETAIN	SCKGRN	-	-	-	-	-	-	-	-	-	4	152	-	-	-	156
WIRETAIN	SCKINT	-	-	-	-	-	-	-	-	-	71	29	-	-	-	100
WIRETAIN	SCKO_Y	-	-	-	-	-	-	-	-	-	6	-	-	-	72	79
WIRETAIN	SCKOTH	-	-	-	-	-	-	78	-	-	69	-	-	-	-	148
WIRETAIN	SCKWH	-	236	-	-	19	-	-	-	-	210	-	-	-	-	465
WIRETAIN	SCKWH1	-	59	-	-	-	-	-	-	-	186	-	-	-	-	245
WIRETAIN	TRAY_F	-	72	-	78	248	-	-	230	-	1,598	8	-	22	1,025	3,280
WIRETAIN	TRAY_L	-	72	69	84	-	-	-	76	-	580	-	-	43	144	1,067
WIRETAIN	TRAY_P	-	82	-	7	-	-	-	120	-	391	-	-	-	230	830
Z-OTH CN	BUNDLE	-	-	-	-	301	-	77	38	-	526	-	-	-	297	1,239
Z-OTH CN	CONCON	-	-	-	-	-	-	-	-	-	72	-	-	-	-	72
Z-OTH CN	OTHR_I	-	72	-	-	-	-	-	-	-	69	-	-	-	-	141
Z-OTH CN	PALLET	-	-	-	-	-	-	-	-	-	67	-	-	-	-	67
Z-OTH CN	PC_CRD	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Z-OTH CN	PC_FLT	-	-	-	72	-	-	21	-	-	78	-	-	88	159	417
Z-OTH CN	PC_IPP	-	98	-	-	-	-	-	-	-	8	-	-	-	-	105
Z-OTH CN	PC_LTR	-	-	-	-	-	-	5	-	-	69	-	-	-	282	356
Z-OTH CN	PC_PCL	135	156	-	-	-	-	78	38	-	562	-	-	78	200	1,246
Z-OTH CN	SCKB_O	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Z-OTH CN	SCKBWN	-	-	-	-	-	-	75	-	-	-	-	-	-	-	75
Z-OTH CN	SCKGRN	-	-	-	-	-	-	-	-	-	67	-	-	-	-	67
Z-OTH CN	SCKINT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Z-OTH CN	SCKO_Y	-	-	-	-	-	-	-	-	-	76	-	-	-	79	155
Z-OTH CN	SCKWH	-	132	-	-	-	-	-	-	-	-	-	-	-	-	132
Z-OTH CN	SCKWH1	-	210	-	-	-	-	-	-	-	35	-	-	-	-	244
Z-OTH CN	TRAY_F	-	-	-	96	148	-	-	37	-	269	-	-	54	122	725
Z-OTH CN	TRAY_L	67	-	67	297	-	-	103	537	50	971	-	-	13	66	144
Z-OTH CN	TRAY_P	-	-	-	-	-	-	-	-	-	138	-	-	-	-	138
Subtotal		13,047	36,863	24,556	28,856	25,508	3,766	18,025	70,342	31,567	278,849	9,092	4,711	14,437	6,347	104,088
Total for Table 2		17,511	38,747	28,162	34,076	30,703	4,192	22,914	84,429	33,798	294,550	16,388	5,001	18,393	9,411	116,747

Table 3 BY 05 Mixed Tallies (\$-weighted adjusted to the cost pool) for Unidentified and Empty Pallets, Short Pallet Boxes and Wheeled Container Types.

		BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED	Total
Unidentified and Empty Pallets, Short Pallet Boxes, and Wheeled Container Types																	
AIR CARG	Empty	-	-	-	-	-	-	74	229	-	668	-	-	67	66	-	1,108
AIR CARG	uncntd	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
BMC-OTR	Empty	5,257	10,425	534	1,546	2,15	44	1,135	2,200	183	16,237	282	85	1,602	1,163	3,074	43,941
BMC-OTR	uncntd	392	272	68	-	-	-	77	94	-	1,123	103	-	67	-	-	2,196
ERMC/GPC	Empty	1,677	3,406	3,845	13,616	2,503	1,177	1,183	22,356	5,397	75,057	2,755	1,522	3,379	1,447	19,257	164,831
ERMC/GPC	uncntd	-	64	72	495	81	-	93	258	-	2,429	-	-	-	-	69	3,560
FLATCART	Empty	-	128	-	148	5,740	-	791	1,286	613	1,904	74	-	68	-	429	11,181
FLATCART	uncntd	-	-	-	-	199	-	-	-	-	-	-	-	-	-	-	189
HAMPER	Empty	1,438	1,003	4,426	2,606	1,768	282	2,724	6,365	709	13,960	1,802	115	1,412	602	10,728	49,938
HAMPER	uncntd	-	-	263	151	111	-	131	81	-	1,200	-	-	252	-	410	2,803
NOTIN CN	Empty	1,703	1,042	974	1,523	701	198	1,111	2,365	472	7,190	370	-	1,134	262	3,169	22,215
NOTIN CN	uncntd	45	-	-	-	-	67	-	80	-	284	-	-	46	-	-	521
NUT TRCK	Empty	-	267	292	1,516	1,121	-	1,654	2,603	707	4,646	613	282	408	313	2,495	16,930
NUT TRCK	uncntd	-	-	-	-	-	-	-	-	-	207	5	-	-	94	-	305
PALLET	Empty	1,635	3,458	67	220	226	68	301	651	394	8,044	148	440	631	117	968	17,368
PALLET	uncntd	87	203	-	-	-	-	-	-	-	442	-	-	-	-	-	732
PALLET1	Empty	464	1,213	230	382	609	-	157	887	236	4,845	85	-	67	68	852	10,146
PALLET1	uncntd	-	677	-	-	-	-	-	-	-	391	74	-	-	-	-	1,242
U-CART	Empty	-	-	702	553	784	-	394	1,403	544	1,247	246	178	342	-	1,202	7,195
U-CART	uncntd	-	-	-	-	-	-	-	81	-	-	-	-	-	-	-	81
WIRETAIN	Empty	692	2,492	514	569	1,133	-	1,132	2,333	462	8,394	368	-	459	592	1,089	20,128
WIRETAIN	uncntd	64	-	-	-	-	-	-	77	-	485	107	-	-	-	-	733
Z-OTH CN	Empty	454	800	-	225	151	66	77	912	232	1,164	-	-	158	137	491	4,866
Z-OTH CN	uncntd	-	13	-	5	-	-	-	-	-	69	-	-	-	-	-	211
Total for Table 3		13,909	25,546	11,980	23,655	14,884	1,873	17,310	44,260	9,998	150,087	7,034	2,622	10,092	4,860	44,233	382,420

Table 4 BY 05 Mixed Tallies (\$-weighted adjusted to the cost pool) for Tall Pallets

		BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED	Total
Tall Pallet Boxes																	
Total for Table 4		2,814	23,054	229	562	155	-	1,111	1,298	228	14,572	202	119	593	364	2,126	47,429
TOTAL HANDLINGS		124,401	134,279	204,929	126,039	203,010	21,123	135,630	319,986	70,444	635,563	77,005	18,613	61,184	42,736	350,880	2,525,823

Table 1 BY05 Percent of Total Handlings for Direct Tallies (\$ weighted adjusted to the cost pool) by piece shapes, bundles, pallets, short pallet boxes, and container (wheeled and non-wheeled) types

		BMC5	BMC5	MODS 17	MODS 17	MODS 17	MODS 17	MODS 17	MODS 17	MODS 17	MODS 17	MODS 17	MODS 17	MODS 17	MODS 17	MODS 17	NONMODS	Total
		OTHR	PLA	1CANCEL	1DSPATCH	1FLATERR	1INTERPRE	1OPBULK	1OPPRE	1OPTTRANS	1PLATFORM	1POUCHNG	1PRESORT	1SACKS_H	1SCAN	ALLIED		
Direct Tallies																		
dir pc	PC_CRD	0.6%	0.0%	2.5%	0.6%	0.1%	0.3%	0.2%	0.5%	0.5%	0.1%	0.1%	0.0%	0.0%	0.0%	0.8%	0.5%	
dir pc	PC_FLT	9.2%	0.6%	11.3%	5.0%	18.1%	8.3%	7.3%	6.8%	6.0%	2.3%	10.5%	3.2%	2.7%	3.2%	6.5%	7.4%	
dir pc	PC_IPP	11.4%	1.8%	2.1%	1.2%	0.4%	3.5%	1.4%	2.5%	0.4%	1.0%	15.9%	2.0%	3.6%	3.8%	1.3%	2.4%	
dir pc	PC_LTR	6.4%	0.2%	52.7%	6.4%	0.8%	18.0%	7.5%	9.8%	8.7%	2.3%	4.2%	9.8%	2.0%	2.0%	10.9%	9.5%	
dir pc	PC_PCL	19.4%	4.4%	2.0%	2.2%	0.7%	1.0%	3.4%	3.4%	0.7%	2.7%	11.7%	4.8%	7.8%	13.6%	3.8%	4.1%	
dir item	BUNDLE	4.3%	1.2%	1.4%	5.3%	39.9%	6.7%	17.7%	7.5%	3.0%	2.7%	10.7%	6.8%	9.2%	3.8%	11.6%	8.9%	
dir item	CONCON	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
dir item	OTHR_I	0.1%	0.3%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	
dir item	SCKB_O	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.2%	0.1%	0.0%	0.3%	0.9%	0.0%	0.1%	
dir item	SCKBWN	1.3%	0.7%	0.0%	0.9%	0.1%	0.0%	0.7%	0.8%	0.1%	0.4%	1.5%	0.0%	4.7%	0.0%	0.2%	0.6%	
dir item	SCKGRN	0.1%	0.0%	0.0%	0.1%	0.0%	0.9%	0.1%	0.0%	0.0%	0.1%	1.9%	0.0%	0.4%	1.0%	0.5%	0.2%	
dir item	SCKINT	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	
dir item	SCKO_Y	0.2%	0.2%	0.0%	0.8%	0.1%	0.0%	0.2%	0.6%	0.1%	0.4%	1.0%	0.5%	3.2%	10.5%	0.2%	0.6%	
dir item	SCKOTH	0.0%	0.2%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	
dir item	SCKWH	2.0%	1.5%	0.0%	0.3%	0.1%	0.6%	1.5%	0.4%	0.1%	0.3%	0.3%	0.0%	2.9%	0.2%	0.3%	0.5%	
dir item	SCKWH1	1.8%	1.8%	0.0%	0.3%	0.1%	0.0%	0.9%	0.3%	0.4%	0.2%	1.0%	0.7%	2.7%	0.0%	0.6%	0.6%	
dir item	TRAY_F	0.8%	0.5%	2.9%	11.3%	4.0%	6.2%	3.7%	4.4%	2.5%	2.2%	2.2%	3.5%	3.0%	9.1%	8.7%	4.2%	
dir item	TRAY_L	10.4%	3.2%	4.3%	16.2%	0.8%	12.9%	21.3%	18.0%	8.8%	4.1%	5.7%	20.7%	4.9%	16.0%	5.1%	8.1%	
dir item	TRAY_P	0.3%	0.1%	0.1%	0.1%	0.0%	0.3%	0.2%	0.1%	0.1%	0.1%	0.0%	0.0%	0.2%	0.0%	0.1%	0.1%	
dir Cont	AIR CARG	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
dir Cont	BMC-OTR	0.7%	1.5%	0.0%	0.2%	0.0%	0.0%	0.5%	0.2%	0.0%	0.3%	0.0%	0.0%	0.2%	0.0%	0.0%	0.3%	
dir Cont	ERMIC/GPI	0.3%	0.7%	0.1%	1.1%	0.1%	0.7%	1.1%	1.2%	2.1%	1.7%	0.3%	0.0%	1.0%	0.4%	0.6%	0.9%	
dir Cont	FLATCAR	0.0%	0.0%	0.0%	0.1%	0.6%	0.0%	0.0%	0.1%	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	
dir Cont	HAMPER	0.1%	0.4%	0.3%	0.1%	0.4%	0.0%	0.1%	0.2%	0.2%	0.5%	0.2%	0.6%	0.3%	0.0%	0.5%	0.4%	
dir Cont	NOTIN CN	0.8%	1.2%	0.1%	0.6%	0.4%	0.6%	0.5%	0.7%	0.3%	0.6%	0.8%	0.0%	0.7%	0.8%	0.1%	0.5%	
dir Cont	NUT TRCH	0.0%	0.1%	0.0%	0.2%	0.1%	0.0%	0.3%	0.2%	0.9%	0.1%	0.1%	1.2%	0.4%	0.0%	0.0%	0.1%	
dir Cont	PALLET	1.7%	8.2%	0.1%	0.4%	0.1%	1.1%	1.7%	0.6%	0.7%	3.2%	0.5%	4.7%	1.1%	0.0%	1.0%	1.8%	
dir Cont	PALLET1	0.3%	5.5%	0.1%	0.3%	0.2%	0.3%	0.5%	0.3%	0.7%	1.8%	0.2%	0.0%	0.6%	0.2%	0.3%	0.9%	
dir Cont	U-CART	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	
dir Cont	WIRETAIN	0.2%	0.4%	0.0%	0.2%	0.1%	0.4%	0.2%	0.0%	0.3%	0.2%	0.1%	0.0%	0.3%	0.0%	0.0%	0.1%	
dir Cont	Z-OTH CN	0.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Total for Table 1		72.5%	34.9%	80.3%	53.8%	77.5%	71.2%	69.5%	59.4%	37.5%	27.7%	69.3%	58.4%	52.5%	65.8%	53.5%	53.1%	

Table 2 BY 05 Percent of Total Handlings for Mixed Trailers (5-weighted adjusted to the cost pool) by Single Bundles and Non-Wheeled Container Types, and by Piece Shapes, Bundles and Non-Wheeled Types for Identified Pallets, Short Pallet Boxes, and Wheeled Container Types

Mixed Trailers for Single Bundles and Non-Wheeled Container Types																	Total	
BMC5		BMC5		MODS 17		MODS 17		MODS 17		MODS 17		MODS 17		MODS 17		MODS 17		Total
OTHER		PLA		ICANCEL		DISPATCH		FLATPER		MODS 17		MODS 17		MODS 17		MODS 17		Total
BUNDLE		CONCON		OTHER_I		SKCB_O		SKCBWN		SKCBGRN		SKCB_Y		SKCBWH		SKCBWH1		Total
0.5%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		

BMC-OTR	SCKO_Y	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.1%	0.3%	0.6%	0.1%	0.0%	0.3%	1.4%	0.0%	0.2%
BMC-OTR	SCKOTH	0.1%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%
BMC-OTR	SCKWH	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.3%	0.0%	0.0%	0.1%
BMC-OTR	SCKWH1	0.1%	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.1%	0.0%	0.3%	0.0%	0.1%	0.1%
BMC-OTR	TRAY_F	0.1%	0.4%	0.0%	0.3%	0.2%	0.0%	0.1%	0.3%	0.4%	0.7%	0.0%	0.0%	0.3%	0.6%	0.3%	0.3%
BMC-OTR	TRAY_L	0.7%	1.2%	0.0%	0.4%	0.0%	0.0%	0.4%	0.3%	0.2%	1.0%	0.0%	0.0%	0.3%	0.3%	0.2%	0.5%
BMC-OTR	TRAY_P	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
ERMC/GPC	BUNDLE	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.3%	0.1%	0.0%	0.3%	0.1%	0.7%	0.2%	0.0%	0.6%	0.2%
ERMC/GPC	CONCON	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
ERMC/GPC	OTHR_I	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.1%	0.1%
ERMC/GPC	PALLET	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
ERMC/GPC	PC_CRD	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
ERMC/GPC	PC_FLT	0.0%	0.1%	0.2%	0.3%	0.2%	0.0%	0.1%	0.5%	0.7%	0.8%	0.0%	0.0%	0.5%	0.2%	1.0%	0.5%
ERMC/GPC	PC_IPP	0.1%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.1%	0.0%	0.3%	0.1%	0.0%	0.3%	0.0%	0.2%	0.1%
ERMC/GPC	PC_LTR	0.0%	0.0%	0.1%	0.3%	0.0%	0.1%	0.1%	0.4%	1.1%	0.8%	0.0%	0.6%	0.2%	0.3%	0.5%	0.4%
ERMC/GPC	PC_PCL	0.7%	3.4%	0.2%	0.7%	0.2%	0.6%	0.0%	0.7%	0.9%	3.3%	0.8%	0.4%	1.6%	1.0%	2.2%	1.6%
ERMC/GPC	SCKB_O	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.3%	0.2%	0.0%	0.2%	0.0%	0.0%	0.1%
ERMC/GPC	SCKBWN	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.3%	0.0%	0.9%	0.3%	0.0%	0.1%	0.1%
ERMC/GPC	SCKGRN	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	0.2%	0.1%	0.0%	0.1%	0.0%	0.1%	0.1%
ERMC/GPC	SCKINT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
ERMC/GPC	SCKO_Y	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.2%	0.5%	0.6%	0.1%	0.0%	0.5%	1.0%	0.1%	0.3%
ERMC/GPC	SCKOTH	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%
ERMC/GPC	SCKWH	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.1%	0.1%	0.3%	0.0%	0.0%	0.8%	0.0%	0.2%	0.1%
ERMC/GPC	SCKWH1	0.1%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.4%	0.0%	0.3%	0.1%
ERMC/GPC	TRAY_F	0.1%	0.3%	0.8%	3.5%	1.5%	1.3%	0.6%	2.2%	5.7%	6.5%	0.6%	2.4%	2.2%	2.2%	5.4%	3.4%
ERMC/GPC	TRAY_L	0.4%	1.1%	1.1%	6.4%	0.3%	4.0%	3.7%	7.2%	15.2%	9.9%	2.1%	14.2%	3.2%	2.0%	4.9%	5.5%
ERMC/GPC	TRAY_P	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.3%	0.5%	0.0%	0.0%	0.1%	0.0%	0.2%	0.2%
FLATCART	BUNDLE	0.0%	0.0%	0.0%	0.1%	0.3%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLATCART	OTHR_I	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLATCART	PC_CRD	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLATCART	PC_FLT	0.0%	0.0%	0.1%	0.2%	0.4%	0.3%	0.9%	0.5%	3.4%	0.4%	0.1%	0.0%	0.1%	0.0%	0.3%	0.6%
FLATCART	PC_IPP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLATCART	PC_LTR	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLATCART	PC_PCL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLATCART	SCKINT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLATCART	TRAY_F	0.1%	0.0%	0.0%	0.1%	0.5%	0.0%	0.1%	0.0%	0.5%	0.0%	0.1%	0.0%	0.0%	0.0%	0.2%	0.1%
FLATCART	TRAY_L	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FLATCART	TRAY_P	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HAMPER	BUNDLE	0.1%	0.1%	0.0%	0.5%	1.2%	0.0%	0.8%	0.4%	0.3%	0.9%	0.3%	0.0%	0.6%	0.0%	0.5%	0.5%
HAMPER	CONCON	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HAMPER	OTHR_I	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
HAMPER	PC_CRD	0.0%	0.1%	0.2%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%
HAMPER	PC_FLT	0.3%	0.2%	0.6%	0.1%	0.3%	0.4%	0.1%	0.2%	0.8%	0.6%	0.1%	0.8%	0.2%	0.1%	0.5%	0.4%
HAMPER	PC_IPP	0.1%	0.1%	0.1%	0.4%	0.1%	0.1%	0.3%	0.2%	0.2%	0.2%	0.0%	0.3%	0.0%	0.1%	0.2%	0.2%
HAMPER	PC_LTR	0.0%	0.2%	4.5%	0.2%	0.0%	2.5%	0.1%	0.5%	0.5%	0.9%	0.1%	0.0%	0.7%	0.2%	2.3%	1.1%
HAMPER	PC_PCL	0.4%	0.7%	0.4%	0.4%	0.0%	0.5%	0.2%	0.7%	0.3%	1.3%	1.7%	0.0%	1.4%	0.5%	0.7%	0.7%
HAMPER	SCKB_O	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HAMPER	SCKBWN	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HAMPER	SCKGRN	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%
HAMPER	SCKINT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HAMPER	SCKO_Y	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%
HAMPER	SCKOTH	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.1%	0.0%	0.1%	0.0%
HAMPER	SCKWH	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%
HAMPER	SCKWH1	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HAMPER	TRAY_F	0.0%	0.1%	0.3%	0.6%	0.2%	0.7%	0.6%	1.7%	0.7%	0.1%	0.0%	0.0%	0.4%	0.2%	1.0%	0.5%
HAMPER	TRAY_L	0.0%	0.1%	0.2%	0.5%	0.0%	2.4%	0.4%	0.4%	1.5%	0.6%	0.1%	0.7%	0.4%	0.1%	0.5%	0.4%
HAMPER	TRAY_P	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.1%	0.1%
NOTIN CN	BUNDLE	0.1%	0.1%	0.1%	0.1%	0.2%	0.0%	0.2%	0.1%	0.2%	0.1%	0.2%	0.0%	0.1%	0.0%	0.1%	0.1%
NOTIN CN	CONCON	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
NOTIN CN	OTHR_I	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.1%	0.0%	0.0%	0.0%
NOTIN CN	PALLET	0.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
NOTIN CN	PC_CRD	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

U-CART	BUNDLE	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	OTHR_I	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	PC_CRD	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	PC_FLT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	PC_IPP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	PC_LTR	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%
U-CART	PC_PCL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%
U-CART	SCKB_O	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	SCKBWN	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	SCKGRN	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	SCKO_Y	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	SCKOTH	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	SCKWH	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	SCKWH1	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	TRAY_F	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
U-CART	TRAY_L	0.0%	0.0%	0.2%	0.3%	0.0%	0.0%	0.2%	0.3%	1.4%	0.2%	0.1%	0.0%	0.0%	0.0%	0.1%	0.0%
U-CART	TRAY_P	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%
WIRETAIN	BUNDLE	0.3%	0.5%	0.0%	0.2%	0.9%	0.0%	0.3%	0.2%	0.4%	0.7%	0.1%	0.0%	0.3%	0.0%	0.3%	0.4%
WIRETAIN	OTHR_I	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	PC_CRD	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	PC_FLT	0.0%	0.2%	0.0%	0.3%	0.4%	0.0%	0.1%	0.1%	0.3%	0.2%	0.1%	0.0%	0.1%	0.0%	0.2%	0.2%
WIRETAIN	PC_IPP	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.1%	0.3%	0.0%	0.0%	0.0%	0.0%	0.1%
WIRETAIN	PC_LTR	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.1%	0.1%
WIRETAIN	PC_PCL	0.4%	0.7%	0.1%	0.2%	0.0%	0.0%	0.1%	0.2%	0.2%	0.6%	0.2%	0.0%	0.5%	0.2%	0.2%	0.3%
WIRETAIN	SCKB_O	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	SCKBWN	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
WIRETAIN	SCKGRN	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	SCKINT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	SCKO_Y	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	SCKOTH	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	SCKWH	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	SCKWH1	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	TRAY_F	0.0%	0.1%	0.0%	0.1%	0.1%	0.0%	0.0%	0.1%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.3%	0.1%
WIRETAIN	TRAY_L	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%
WIRETAIN	TRAY_P	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
Z-OTH CN	BUNDLE	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
Z-OTH CN	CONCON	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	OTHR_I	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	PALLET	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	PC_CRD	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	PC_FLT	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
Z-OTH CN	PC_IPP	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	PC_LTR	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%
Z-OTH CN	PC_PCL	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%
Z-OTH CN	SCKB_O	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	SCKBWN	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	SCKGRN	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	SCKINT	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	SCKO_Y	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	SCKOTH	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	SCKWH	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	SCKWH1	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	TRAY_F	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
Z-OTH CN	TRAY_L	0.1%	0.0%	0.0%	0.2%	0.0%	0.0%	0.1%	0.2%	0.1%	0.2%	0.0%	0.0%	0.0%	0.2%	0.0%	0.1%
Z-OTH CN	TRAY_P	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Subtotal		10.5%	27.5%	12.0%	22.9%	12.6%	17.8%	13.3%	22.0%	44.8%	43.9%	11.8%	25.3%	23.6%	14.9%	29.7%	26.5%
Total for Table 2		14.1%	28.9%	13.7%	27.0%	15.1%	19.8%	16.9%	26.4%	48.0%	46.3%	21.3%	26.9%	30.1%	22.0%	33.3%	29.9%

Table 3. BY 05 Percent of Total Handlings for Mixed Tallies (\$-weighted adjusted to the cost pool) for Unidentified and Empty Pallets, Short Pallet Boxes and Wheeled Container Types.

		BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED	Total
Unidentified and Empty Pallets, Short Pallet Boxes, and Wheeled Container Types																	
AIR CARG	Empty	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.2%	0.0%	0.0%
AIR CARG	uncntd	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
BMC-OTR	Empty	4.2%	7.8%	0.3%	1.3%	0.1%	0.2%	0.1%	0.7%	0.3%	2.6%	0.4%	0.5%	2.6%	2.7%	0.9%	1.7%
BMC-OTR	uncntd	0.3%	0.2%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.2%	0.1%	0.0%	0.1%	0.0%	0.0%	0.1%
ERMC/GPC	Empty	1.3%	2.5%	1.9%	10.8%	1.3%	5.5%	5.4%	7.0%	7.7%	11.8%	3.6%	8.2%	5.5%	3.4%	5.5%	6.5%
ERMC/GPC	uncntd	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	0.1%	0.1%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
FLATCART	Empty	0.0%	0.1%	0.0%	0.1%	2.8%	0.0%	0.6%	0.4%	0.9%	0.3%	0.1%	0.0%	0.1%	0.0%	0.1%	0.4%
FLATCART	uncntd	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HAMPER	Empty	1.2%	0.7%	2.2%	2.1%	0.0%	1.3%	2.0%	2.0%	1.0%	2.2%	2.3%	0.6%	2.3%	1.4%	3.1%	2.0%
HAMPER	uncntd	0.0%	0.0%	0.1%	0.1%	0.1%	0.0%	0.2%	0.0%	0.0%	0.2%	0.0%	0.0%	0.4%	0.0%	0.1%	0.1%
NOTIN CN	Empty	1.4%	0.8%	0.5%	1.2%	0.3%	0.9%	0.8%	0.7%	0.7%	1.1%	0.5%	0.0%	1.9%	0.6%	0.9%	0.9%
NOTIN CN	uncntd	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
NUT TRCK	Empty	0.0%	0.2%	0.1%	1.2%	0.6%	0.0%	1.2%	0.8%	1.0%	0.7%	0.8%	1.5%	0.7%	0.7%	0.7%	0.7%
NUT TRCK	uncntd	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%
PALLET	Empty	1.3%	2.6%	0.0%	0.2%	0.1%	0.3%	0.2%	0.2%	0.6%	1.3%	0.2%	2.4%	1.0%	0.3%	0.3%	0.7%
PALLET	uncntd	0.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PALLET1	Empty	0.4%	0.9%	0.1%	0.3%	0.3%	0.0%	0.1%	0.3%	0.4%	0.8%	0.1%	0.0%	0.1%	0.2%	0.2%	0.4%
PALLET1	uncntd	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%
U-CART	Empty	0.0%	0.0%	0.3%	0.4%	0.2%	0.0%	0.3%	0.4%	0.8%	0.2%	0.3%	1.0%	0.6%	0.0%	0.3%	0.3%
U-CART	uncntd	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WIRETAIN	Empty	0.6%	1.9%	0.3%	0.5%	0.5%	0.0%	0.8%	0.7%	1.3%	0.5%	0.0%	0.7%	1.4%	0.3%	0.8%	0.8%
WIRETAIN	uncntd	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%
Z-OTH CN	Empty	0.4%	0.6%	0.0%	0.2%	0.1%	0.3%	0.1%	0.3%	0.3%	0.2%	0.0%	0.0%	0.3%	0.3%	0.1%	0.2%
Z-OTH CN	uncntd	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total for Table 3		11.2%	19.1%	5.9%	18.8%	7.3%	9.0%	12.8%	13.8%	14.2%	23.6%	9.1%	14.1%	16.5%	11.4%	12.6%	15.1%

Table 4. BY 05 Percent of Total Handlings for Mixed Tallies (\$-weighted adjusted to the cost pool) for Tall Pallet Boxes

		BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED	Total
Tall Pallet Boxes																	
Total for Table 4		2.3%	17.2%	0.1%	0.4%	0.1%	0.0%	0.8%	0.4%	0.3%	2.3%	0.3%	0.6%	1.0%	0.9%	0.6%	1.9%
TOTAL HANDLINGS		100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Table 1. BY05 Number of Records for Direct Tallies by piece shapes, bundles, pallets, short pallet boxes, and container (wheeled and non-wheeled) types

	BMCS OTHR	BMCS PLA	MODS 17 1CANCELL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPPREP	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED
Direct Tallies															
dir pc PC_CRD	7		72		2		1	21	2	6	1				23
dir pc PC_FLT	144	10	311	83	661	26	113	252	51	190	111	5	24	19	200
dir pc PC_IPP	172	29	62	21	8		22	88	2	76	152	3	26	25	46
dir pc PC_LTR	100	4	1517	104	21	4	118	171	70	181	47	14	13	12	298
dir pc PC_PCL	319	71	58	47	11	1	26	138	6	212	152	7	64	82	112
dir item BUNDLE	71	22	39	79	966	17	261	211	27	202	97	11	74	21	340
dir item CONCON										2					
dir item OTHR_I	3	3			1		1	1	1	18	1				4
dir item SCKB_O	2		2				1	4		20	2		5	14	2
dir item SCKBWN	29	10	1	25	7		15	45	1	37	24		53		8
dir item SCKGRN	1		1	5			4	3		23	40		7	7	24
dir item SCKINT		1					1	1		3	7		2	4	
dir item SCKO_Y	5	7	2	24	8		6	37	3	58	27	1	36	107	8
dir item SCKOTH		1				1				1	2				
dir item SCKWH	34	26	1	10	3	6	20	17	1	34	5		29	2	8
dir item SCKWH1	33	40	1	9	6		16	28	5	30	26	1	50		24
dir item TRAY_F	12	8	85	173	99	19	59	175	23	189	24	5	24	53	274
dir item TRAY_L	167	50	121	261	18	40	314	663	80	334	53	32	43	90	147
dir item TRAY_P	5	2	3	4		3	1	7		9			3		8
dir Cont AIR CARG	1	1								1					
dir Cont BMC-OTR	13	29	1	3			8	6		24			2		2
dir Cont ERMG/GPC	5	14	3	18	3	2	17	45	16	135	3		8	2	17
dir Cont FLATCART				1	15			3		3					
dir Cont HAMPER	2	7	10	2	10		2	10	2	42	2	1	3		2
dir Cont NOTIN CN	15	18	3	10	8	2	8	25	3	48	8		5	5	13
dir Cont NUT TRCK		2		4	2		5	10	8	5		2	4		3
dir Cont PALLET	29	138	3	8	4	3	32	23	7	284	5	6	10		32
dir Cont PALLET1	5	99	2	4	6	1	13	25	7	214	5		5	1	18
dir Cont U-CART															
dir Cont WIRETAIN	3	7		3	2	1	4	2		4					3
dir Cont Z-OTH CN	1	4	1		1		3	1		2	15	1	3		1
Total Direct	1 178	603	2 319	905	1 797	225	1 077	2 276	322	2 403	796	88	493	444	1,617

Table 2. BY 05 Number of Records for Mixed Tallies by Single Bundles and Non-Wheeled Container Types, and by Piece Shapes, Bundles and Non-Wheeled Types for Identified Pallets, Short Pallet Boxes, and Wheeled Container Types.

	BMCS OTHR	BMCS PLA	MODS 17 1CANCELL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPPREP	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED
Mixed Tallies for Single Bundles and Non-Wheeled Container Types															
BUNDLE uncnld	7	1		1	16		6	3			2				7
CONCON uncnld				1						2					
OTHR_I uncnld	2	4	1	1						11			1		
SCKB_O uncnld								2		1			1	1	1
SCKBWN uncnld		1		1				2		1			5		1
SCKGRN uncnld				1				2		2	1				1
SCKO_Y uncnld				3			1	3		8	2		1	15	1
SCKOTH uncnld	1						1						1		
SCKWH uncnld	2	1					1	1		4	3		3		3
SCKWH1 uncnld	8	3		2				3		1	1		4		3
TRAY_F uncnld				1			1	1		1					
TRAY_L uncnld	1						1								
TRAY_P uncnld		1			1			1		2	1		1		
CONCON Empty				2						5	1				
OTHR_I Empty	4	7	1	3	4	1	4	11	2	28	2		1		5
SCKB_O Empty			2					3		5				1	
SCKBWN Empty				2			2	6	2	2	10		2		2
SCKGRN Empty			1	3			2	4		3	24		1		2
SCKINT Empty		1		3				1		1	6	1	3	3	
SCKO_Y Empty				6	1		2	13	3	9	9	1	3	1	1
SCKOTH Empty		1						1					1		
SCKWH Empty	3	1	1	2	1		4	3		6	13		3		3
SCKWH1 Empty	18						5	5		2	11		11	1	6
TRAY_F Empty	3	2	18	20	30		5	37	8	50	5		4	3	30
TRAY_L Empty	11	3	28	19	2	5	26	70	8	43	4	1	3	13	23

Table 2 BY 05 Number of Records for Mixed Tallies by Single Bundles and Non-Wheeled Container Types and by Piece Shapes Bundles and Non-Wheeled Types for Identified Pallets, Short Pallet Boxes and Wheeled Container Types

		for Identified Pallets, Short Pallet Boxes, and Wheeled Container Types														
		BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATFRF	MODS 17 1HMPREF	MODS 17 1HBRFL	MODS 17 1HMPREF	MODS 17 1HTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED
Mixed Tallies for Single Bundles and Non-Wheeled Container Types	TRAY_P	Empty	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Subtotal			61	26	52	71	56	4	40	176	23	189	95	3	53	38
Mixed Tallies for Identified Pallets, Short Pallet Boxes, and Wheeled Container Types																
AIR CARG	BUNDLE											1				
AIR CARG	CONCON											1				
AIR CARG	OTHR_I											2				
AIR CARG	PC_FLT					1	2				1					2
AIR CARG	PC_IPP															
AIR CARG	PC_LTR															
AIR CARG	PC_PCL														1	
AIR CARG	SCKB_O									2		10				
AIR CARG	SCKINT											1				
AIR CARG	SCKO_Y															
AIR CARG	SCKOTH															
AIR CARG	TRAY_F											1				
AIR CARG	TRAY_L											7				
AIR CARG	TRAY_P											4				
BMC-QTR	BUNDLE		2				3		9	3	1	12			2	1
BMC-QTR	CONCON											1				4
BMC-QTR	OTHR_I	1	3			1						5				
BMC-QTR	PALLET		3									7				1
BMC-QTR	PC_CRD															
BMC-QTR	PC_FLT	3	3	1		2		3	2			22			2	8
BMC-QTR	PC_IPP	7	6					5	3			33	1		3	10
BMC-QTR	PC_LTR	1	2	2	1			4	2			7				2
BMC-QTR	PC_PCL	55	132	6	6	2	1	7	17	3		205	6		13	86
BMC-QTR	SCKB_O											9				
BMC-QTR	SCKBWN	1	5		1			4	4			16	1		2	1
BMC-QTR	SCKGRN				1				1			8			1	5
BMC-QTR	SCKINT								4			5			1	
BMC-QTR	SCKO_Y		1	1	2				5	3		61	2		4	9
BMC-QTR	SCKOTH	3	22		1							6			2	1
BMC-QTR	SCKWH	1	20					3	2			14				
BMC-QTR	SCKWH1	3	33					1	5			19	1		3	5
BMC-QTR	TRAY_F	3	19		5	5		2	13	4		87			3	16
BMC-QTR	TRAY_L	14	32	1	7			2	13						3	5
BMC-QTR	TRAY_P	2	5	1				9	14	3		109			4	2
ERMC/GPC	BUNDLE			2	3	4		7	7			41	2	1	2	12
ERMC/GPC	CONCON															
ERMC/GPC	OTHR_I	1	1	2	2			1	1	1		2				
ERMC/GPC	PALLET		1									8	1			3
ERMC/GPC	PC_CRD			2	1				1			3				1
ERMC/GPC	PC_FLT		2	9	7	7		1	22	7		107	1		6	44
ERMC/GPC	PC_IPP	2	4	2	5	1			11	1		55	3		4	11
ERMC/GPC	PC_LTR			6	5	1		1	16	11		74		1	3	23
ERMC/GPC	PC_PCL	14	74	9	14	2	3	1	40	9		372	9	1	19	87
ERMC/GPC	SCKB_O			1					5			40	2		4	4
ERMC/GPC	SCKBWN		5		3			1	4			37		2	5	5
ERMC/GPC	SCKGRN			1	1			2	2	1		25	2		1	4
ERMC/GPC	SCKINT					1			1			1				
ERMC/GPC	SCKO_Y			2	3			2	11	5		86	1		7	4
ERMC/GPC	SCKOTH				1				2			11			1	1
ERMC/GPC	SCKWH		3	1	4				1	2		21	1		5	6
ERMC/GPC	SCKWH1	2	3	1	3				3	1		31	1		5	10
ERMC/GPC	TRAY_F	2	18	31	58	38	7	12	105	52	651	9		5	26	15
ERMC/GPC	TRAY_L	8	28	39	109	7	13	62	277	135	903	21	20		32	13
ERMC/GPC	TRAY_P	2	9	5					7	3		54	1		2	7
FLATCART	BUNDLE				1	7			1			2				2
FLATCART	OTHR_I															
FLATCART	PC_CRD					1										
FLATCART	PC_FLT			3	3	78	1	13	18	30		37	1		1	6
FLATCART	PC_IPP								1			1				
FLATCART	PC_LTR					1										
FLATCART	PC_PCL					1			2			1				

Table 2. BY 05 Number of Records for Mixed Tallies by Single Bundles and Non-Wheeled Container Types, and by Piece Shapes: Bundles and Non-Wheeled Types
for Identified Pallets, Short Pallet Boxes, and Wheeled Container Types

		BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1ELATED	MODS 17 1INTERFER	MODS 17 1NEB LA	MODS 17 1OPPRET	MODS 17 1OPTRANS	MODS 17 1PLATERN	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED
Mixed Tallies for Single Bundles and Non-Wheeled Container Types																
FLATCART	SCKINT															
FLATCART	TRAY_F	1		1	2	12			5		2					6
FLATCART	TRAY_L				2											
FLATCART	TRAY_P															
HAMPER	BUNDLE	3	2	3	9	11		15	21	4	84	3		4		22
HAMPER	CONCON															
HAMPER	OTHR_I	1		1	1						3					3
HAMPER	PC_CRD		2	29					6		15			1	1	21
HAMPER	PC_FLT	8	6	53	3	13	2	2	23	9	89	2	1	6	1	56
HAMPER	PC_IPP	3	4	20	9	2	1	2	16	5	52	5		6		13
HAMPER	PC_LTR	4	6	148	4	1	10	2	24	5	96	2		8	2	90
HAMPER	PC_PCL	9	17	30	11	2	2	3	35	5	143	16		19	5	42
HAMPER	SCKB_O							1			14			1		
HAMPER	SCKBWN				1	1			1		3			1		1
HAMPER	SCKGRN				1						2	1				
HAMPER	SCKINT															
HAMPER	SCKO_Y			1					1		15	2		1	1	4
HAMPER	SCKOTH										1	2		1		2
HAMPER	SCKWH				2						3	1				
HAMPER	SCKWH1								2							2
HAMPER	TRAY_F		3	15	12	6	3	2	28	17	78			5	2	43
HAMPER	TRAY_L	1	1	9	10	1	5	4	18	13	68	2	1	5	1	24
HAMPER	TRAY_P		1	3		1		1	2		21	1				8
NOTIN CN	BUNDLE	4	2	2	5	11		6	7	3	22	3		1		3
NOTIN CN	CONCON										1					
NOTIN CN	OTHR_I	2	5	2	1	1			1		8			1	1	
NOTIN CN	PALLET	1	6					1			21					
NOTIN CN	PC_CRD			2	4		2	1	3		2					3
NOTIN CN	PC_FLT	5	4	12	9	16		2	5	11	5		1	3		15
NOTIN CN	PC_IPP	1	3	5	2	1		2	5	1	7	1	1			6
NOTIN CN	PC_LTR	6	4	16	9		2	3	6	2	17	1	2	1		15
NOTIN CN	PC_PCL	5	8	9	6			5	12	1	42	2		5	1	7
NOTIN CN	SCKB_O			1	1						4			1		1
NOTIN CN	SCKBWN	2	2		1				1		3			2		2
NOTIN CN	SCKGRN				1				1		3					1
NOTIN CN	SCKINT															
NOTIN CN	SCKO_Y			1					4		7					2
NOTIN CN	SCKOTH	1	1	1	3				1		1					
NOTIN CN	SCKWH	1	1		1				1		3			2		
NOTIN CN	SCKWH1	3	5		2					1	2		1	2	1	
NOTIN CN	TRAY_F		5	6	12	4	2	2	13		36	1		5	3	11
NOTIN CN	TRAY_L	5	9	8	15		4	8	20	2	40		1	4	3	13
NOTIN CN	TRAY_P	1		2	1				2	2	27	1		1	1	5
NUT.TRCK	BUNDLE					1					2	1				4
NUT.TRCK	CONCON				1						1					
NUT.TRCK	OTHR_I		1		1											
NUT.TRCK	PALLET										1					
NUT.TRCK	PC_FLT			2		6		2	5	1	9	1		1		2
NUT.TRCK	PC_IPP										2					
NUT.TRCK	PC_LTR				2	1		1	1	4	4					
NUT.TRCK	PC_PCL	3	3					1	3	1	5	1		2	1	3
NUT.TRCK	SCKB_O								2		4					
NUT.TRCK	SCKBWN				1					1	4			2		1
NUT.TRCK	SCKGRN															
NUT.TRCK	SCKINT								1			1		1		
NUT.TRCK	SCKO_Y				2						6			2	1	
NUT.TRCK	SCKOTH		1								1					
NUT.TRCK	SCKWH	1	1						1							
NUT.TRCK	SCKWH1		4		1					1	2					
NUT.TRCK	TRAY_F			3	14	10	2	2	11		31	2				1
NUT.TRCK	TRAY_L	1		3	9	1	3	16	38	22	37	1	4	2	2	12
NUT.TRCK	TRAY_P									1				1	1	2
PALLET	BUNDLE		1						1		5					
PALLET	OTHR_I		1								1					
PALLET	PC_CRD		1													

Table 2. BY 05 Number of Records for Mixed Trailles by Single Bundles and Non-Wheeled Container Types, and by Piece Shapes, Bundles and Non-Wheeled Types
for Identified Pallets, Short Pallet Boxes, and Wheeled Container Types

	BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBRK	MODS 17 1OPPREP	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED
Mixed Trailles for Single Bundles and Non-Wheeled Container Types															
PALLET	PC_FLT	2								2					1
PALLET	PC_IPP									1					
PALLET	PC_LTR									2					
PALLET	PC_PCL	4	5							5					4
PALLET	SCKBWN									1					
PALLET	SCKOTH		1							1					
PALLET	SCKWH		1												
PALLET	SCKWH1									1					
PALLET	TRAY_F		2				1			4					
PALLET	TRAY_L	7	17		2			2	1	18			1		1
PALLET1	BUNDLE		7			1		2	1	37	1		1		2
PALLET1	OTHR_I		1							1					
PALLET1	PALLET									1					
PALLET1	PC_CRD														
PALLET1	PC_FLT		5			1		1		20	1		1		2
PALLET1	PC_IPP	2						1		6					
PALLET1	PC_LTR			1					1	2					
PALLET1	PC_PCL	3	15					2	2	33	1		1	1	2
PALLET1	SCKBWN						1			3					
PALLET1	SCKO_Y									2					
PALLET1	SCKWH		2												
PALLET1	SCKWH1		3							1			1		
PALLET1	TRAY_F		4					1		5	1				
PALLET1	TRAY_L		6		1		1		1	5	1				
PALLET1	TRAY_P		2					1		5					
U-CART	BUNDLE			1		1		1	1	3	1				1
U-CART	OTHR_I														
U-CART	PC_CRD			1	1				1						
U-CART	PC_FLT			1	1	4		3	1	7				1	3
U-CART	PC_IPP			1	1			2		3	2				2
U-CART	PC_LTR			7	2			3	1	4	1				6
U-CART	PC_PCL	1			1			2	1	3	1				2
U-CART	SCKB_O							1							
U-CART	SCKBWN									2					
U-CART	SCKGRN														
U-CART	SCKO_Y													1	
U-CART	SCKOTH								1						
U-CART	SCKWH														
U-CART	SCKWH1	1													
U-CART	TRAY_F			2		2		1	1	5					3
U-CART	TRAY_L			6	5			2	11	13	16	1			3
U-CART	TRAY_P												1		1
WIRETAIN	BUNDLE	5	8	1	7	23		6	11	4	70	1		3	12
WIRETAIN	OTHR_I									1					
WIRETAIN	PC_CRD									2					1
WIRETAIN	PC_FLT		6		8	11		3	9	4	34	2		3	8
WIRETAIN	PC_IPP	3	2	2	3			2	5		20	10		1	2
WIRETAIN	PC_LTR		3	6		1		1			4				5
WIRETAIN	PC_PCL	8	15	3	5	2		1	10	3	62	5		7	8
WIRETAIN	SCKB_O				1									1	
WIRETAIN	SCKBWN								2		3			1	1
WIRETAIN	SCKGRN									7	1				
WIRETAIN	SCKINT									1	2				
WIRETAIN	SCKO_Y										6				
WIRETAIN	SCKOTH									1	1				1
WIRETAIN	SCKWH		4			1				3					
WIRETAIN	SCKWH1		2							3					
WIRETAIN	TRAY_F		1		1	4			3		22	2		1	9
WIRETAIN	TRAY_L		1	1	1				1		9				3
WIRETAIN	TRAY_P		2		1				2		7				2
Z-OTH CN	BUNDLE					4		1	1		5				3
Z-OTH CN	CONCON										1				
Z-OTH CN	OTHR_I		1							1					
Z-OTH CN	PALLET									1					
Z-OTH CN	PC_CRD														

Table 2. BY 05 Number of Records for Mixed Tallies by Single Bundles and Non-Wheeled Container Types, and by Piece Shapes, Bundles and Non-Wheeled Types for Identified Pallets, Short Pallet Boxes, and Wheeled Container Types

	BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED
Mixed Tallies for Single Bundles and Non-Wheeled Container Types															
Z-OTH CN PC_FLT					1						2		2		2
Z-OTH CN PC_IPP											1				
Z-OTH CN PC_LTR											1				3
Z-OTH CN PC_PCL		2	4								10		1		1
Z-OTH CN SCKB_O															
Z-OTH CN SCKBWN															
Z-OTH CN SCKGRN															
Z-OTH CN SCKINT															
Z-OTH CN SCKO_Y															1
Z-OTH CN SCKWH			2												
Z-OTH CN SCKWH1			3												
Z-OTH CN TRAY_F				2	2						4				1
Z-OTH CN TRAY_L	1		1	4			1			11			1	1	2
Z-OTH CN TRAY_P										2					
Subtotal	234	674	551	468	345	67	268	1,047	436	4,816	177	43	291	114	1,284
Total for Table 2	295	700	603	539	400	71	328	1,222	459	5,005	272	46	344	152	1,373

Table 3. BY 05 Number of Records for Mixed Tallies for Unidentified and Empty Pallets, Short Pallet Boxes and Wheeled Container Types.

	BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED
Unidentified and Empty Pallets, Short Pallet Boxes, and Wheeled Container Types															
AIR CARG Empty							1	3		9			1	1	
AIR CARG uncnctd															
BMC-OTR Empty	60	133	7	20	3	1	13	29	2	200	3	1	21	18	25
BMC-OTR uncnctd	3	4	1				1	1		7			1		
ERMC/GPC Empty	24	45	55	160	29	17	88	267	63	937	36	12	43	22	164
ERMC/GPC uncnctd		1		6	1		1	3		30					1
FLATCART Empty		2		2	70		9	13	8	26	1		1		4
FLATCART uncnctd					2										
HAMPER Empty	20	9	63	30	20	4	32	74	9	181	23	1	18	6	88
HAMPER uncnctd			4	2			3	1		17			1		4
NOTIN CN Empty	19	12	14	17	9	3	11	30	6	92	5		11	4	32
NOTIN CN uncnctd	1							1		4			1		
NUT.TRCK Empty		4	4	22	12		20	30	9	62	7	2	6	5	17
NUT.TRCK uncnctd										2	1			1	
PALLET Empty	16	49	1	3	3	1	4	8	5	106	2	1	8	2	8
PALLET uncnctd	1	3								7					
PALLET1 Empty	4	17	3	5	4		2	11	4	64	1		1	1	7
PALLET1 uncnctd		9								7	1				
U-CART Empty			10	7	5		2	17	7	15	5	1	5		11
U-CART uncnctd								1							
WIRETAIN Empty	9	33	7	8	13		12	25	6	97	21		4	6	9
WIRETAIN uncnctd	1							1		5	1				
Z-OTH CN Empty	5	11		3	2	1	1	11	3	14			2	2	4
Z-OTH CN uncnctd		2		1						1					
Total for Table 3	163	334	170	286	174	28	200	526	122	1,883	108	18	124	68	374

Table 4. BY 05 Mixed Tallies for Tall Pallet Boxes

	BMCS OTHR	BMCS PLA	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	NONMODS ALLIED
Tall Pallet Boxes															
Total for Table 4	39	311	3	5	2		12	17	3	184	3	1	8	5	18
TOTAL HANDLINGS	1,675	1,948	3,095	1,735	2,373	326	1,617	4,041	906	9,475	1,179	153	969	669	3,382

United States Postal Service

**Nina Yeh
(USPS-T-38)**

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS YEH**

DFC/USPS-T38-15. Please refer to your revised testimony filed on August 10, 2006, at page 6, fn. 2. Please explain how the Postal Service will respond if a customer brings a parcel to a retail window that does not already have postage applied and if the customer requests to send the parcel at the rate for single-piece Bound Printer Matter. Assume that the customer does not desire any special services and that the item qualifies as Bound Printed Matter.

RESPONSE:

The specific procedures have not yet been developed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS YEH**

DFC/USPS-T38-16. Please refer to your revised testimony filed on August 10, 2006, at page 6, fn. 2. Please explain whether a PVI strip or label from a retail terminal is a valid form of postage payment.

RESPONSE:

The intention of the change is to require that postage be pre-applied by the customer.

Therefore, there would be no need for the customer to be given a PVI strip, although the specific procedures applicable to various scenarios that might be envisioned have not yet been developed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS YEH**

DFC/USPS-T38-17. Please refer to your revised testimony filed on August 10, 2006, at page 6, fn. 2. Please explain how the Postal Service will respond if (1) a customer brings a parcel to a retail window that does not already have postage applied, (2) the customer requests to send the parcel at the rate for single-piece Bound Printer Matter, and (3) the customer informs the clerk of the amount of postage that he needs. Assume that the customer does not desire any special services and that the item qualifies as Bound Printed Matter. In your response, please specifically identify the types of postage-payment methods that the Postal Service may offer the customer and that the customer may request.

RESPONSE:

The specific procedures have not yet been developed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS YEH**

DFC/USPS-T38-18. Please refer to your revised testimony filed on August 10, 2006, at page 6, fn. 2. Please explain why the Postal Service cannot achieve its goal of clarifying parcel offerings by retaining Bound Printed Matter rates in the POS system and simply suppressing display of this service option unless a customer, communicating via the window clerk, specifically requests this service.

RESPONSE:

The Postal Service's ultimate goal is to clarify that Bound Printed Matter is a commercial offering, which would therefore not be provided through the retail window or need to be included in retail sales systems. Given the issues raised, the revised footnote represents a significant, but partial, step toward that goal. Further consideration will be given as to the appropriate way to accomplish the goal fully.